Inspector's Interim Findings – additional employment matters

Comment

1. This paper is written on behalf of the Coordinating Team.
2. Some paragraphs are highlighted light grey for emphasis.
3. ED118 was submitted by MBC, entitled "Inspector's Interim Findings – additional employment matters".
4. It included:
   - Appendix A: Maidstone Borough Local Plan Examination – additional analysis in response to Inspector's Interim Findings: Matter 4 Employment; and
   - Appendix B: Calculation of Windfall Allowances for Offices.
5. This paper concludes that MBC's Local Plan, as submitted, may now be unsound, based on MBC's own (new) evidence in ED118.
6. It also concludes that "employment" demands a strategic review across an area far wider than our Borough.

Interim Findings - context

7. In paragraph 108 of his Interim Findings, the Inspector states (our highlighting):

> *"There is evidence that where the adjoining authorities have assessed their employment needs they consider that they can meet their needs within their own areas and in most cases are proposing new employment allocations to that end. However there are apparent disparities between the authorities concerning the number of jobs and the amount of employment land that is being proposed relative to the intended growth in housing in each area. It is also unclear how each authority is taking account of the effect of net cross-border commuting flows. Where flows are currently in equilibrium and likely to remain so this may not matter. However where an authority is planning for particularly high or low rates of job growth relative to the anticipated change in population or housing this could result in sharp changes in commuting patterns.*
>
> ***It is necessary to establish both whether there is likely to be sufficient land overall to accommodate the employment needs and also what effect there may be on travel patterns, including net flows to London or elsewhere.***
>
> ***An assessment is therefore needed which updates the position on job targets and employment land provision in Maidstone and the adjoining Boroughs/Districts within the same economic area relative to the anticipated housing and population growth in those areas".***

8. We agree with the Inspector's insightful observations above.
9. In response, MBC commissioned its economic consultants GVA, now Bilfinger GVA, to undertake further analysis and that is set out in ED118, which throws light on strategic inadequacies within the Local Plan as currently drafted.

<u>ED118 - main points</u>

10. Appendix A of ED118 contains that analysis. Its paragraphs 1.5 to 1.9 state (our highlighting):

" …..this note considers the functional economic area within which Maidstone sits, encompassing the following local authority areas:

- *Medway;*
- *Tonbridge and Malling*
- *Swale;*
- *Ashford; and*
- *Tunbridge Wells".*

" …… It then considers the relationship between forecast population and jobs growth in the sub-region and compares this at a strategic level with current in and out commuting rates".

" ……. we have developed a high level understanding of the potential future impacts of housing and jobs growth (as planned) on the need for residents within the sub-region to commute to other locations to work".

" …… it is clear none use the existing commuting rate as an 'absolute', with the models internally balancing the demand for labour (jobs) and the supply of labour (population) in each local authority area. Where a local authority area is forecast to provide more jobs than the workforce its population creates the models assume in-commuting will increase, where jobs will be below the workforce models assume out- commuting will increase. In equilibrium the commuting rates are held constant".

11. From the findings of their consultants MBC has highlighted certain points:

- there will be 1,306 more additional workers than additional jobs available in our Borough, assuming 2011 commuting patterns. If correct, this would result in an increase of out-commuting from Maidstone of 4% on the 2011 level;
- but, across the sub-region as a whole, there is likely to be a surplus of 1,724 additional jobs over additional workers (not the other way around as stated by MBC), resulting in an increase in <u>in-commuting</u> to the sub-region of 0.9% on the 2011 level; and
- for MBC the proportion of out-commuting to London increased from 10% of trips in 2001 to 20% in 2011 – a doubling in ten years.

12. Bilfinger GVA's conclusion is summarised in paragraphs 1.20 and 1.21 of Appendix A, that is (with our highlighting):

" ……… there is an under-provision of jobs within the sub-region when compared to the number of workers that will be generated by forecast population growth. Whilst the relationship differs in each local authority area in total there would potentially be 1,724 residents who would need to commute out to work who would otherwise have worked locally.

……. it does give a sense of the scale of impact that forecast growth may have on residents commuting outside of the sub-region to work. Overall it would potentially see a further increase in out-commuting of c.1%.

(In fact, it is the reverse: 1724 local jobs without local residents who would wish to take them).

13. In our view, while jobs required and jobs provided are seen to be broadly in balance across the sub-region, the whole issue of increased in- or out-commuting is dismissed as trivial. We believe this is wrong for the reasons set out below.

Wide-Area Perspective

14. The Inspector has required a consideration by MBC of its neighbours. That is, the adoption of a perspective on Maidstone within the context of what its consultants, Bilfinger GVA, refer to as the "sub-region". We very much welcome this approach and something which we note is being given increasing emphasis in the recently published DCLG White Paper.

15. Our team has previously argued that Maidstone's needs could not be considered meaningfully in isolation and that decisions taken in one area would have consequential effects on others. That was especially the case in Maidstone and Tonbridge & Malling, as their principal urban areas are contiguous and highly inter-linked in terms of social and economic activity, including commuting.

16. ED118 now points to a conflict between the narrow geographical perspective of MBC's submitted Local Plan and this much wider, almost strategic perspective of the sub-region. It may also raise a question about soundness of the submitted plan, because its evidence challenges MBC's focus on analysing and making conclusions on housing, employment and infrastructure almost solely within the limitations of the boundaries of the Borough.

Employment Implications

17. MBC's submitted Local Plan claims that 14,400 new jobs will be created within the Borough, but its own consultants, GL Hearn, declare:

> " ….*forecast growth in workforce jobs of 14,394 (18%) – 5,361 more than in the base forecast – this is an ambitious level of growth* ….".

18. MBC has acknowledged on several occasions, including at the examination, that the target for additional jobs over the Local Plan period is ambitious and, on several occasions at the examination, doubt was cast over what was seen as the spurious precision of the figures produced by GVA.

19. The Coordinating Team remains highly sceptical of the figures for jobs needed <u>within</u> the Borough and of some of the conclusions drawn about the figures across the sub-region.

20. In our view, insufficient allowance has been made for the certain increase in out-commuting from the Borough, including to London, over the remaining period of the plan. Certainly the presumption that analysis can reliably be based on the 2011 figures seems to us wholly wrong.

21. The past increase in out-commuting must be partly driven by the inability of Maidstone to attract the kind of high skilled / high wage employment that it has sought over many years. There is nothing in the Plan or in the latest Bilfinger GVA analysis to suggest that will change.

22. Our Coordinating Team and other local groups have repeatedly drawn attention to the failure of Junction 7 to deliver on the terms originally envisaged. Indeed, this is reinforced by the recommendation of consultants employed by MBC that a new business plan is needed for Eclipse Park, because the old one has failed to deliver (Maidstone Economic Development Strategy 2015-31, page 30).

23. The KIMS site at Newnham Park could easily satisfy the demand for office accommodation in the Maidstone area. MBC Officers hope that this space will be taken up with medical uses, but what guarantees does it have that this will be delivered?

24. As to the location of individual sites that may or may not be necessary for employment, the Bilfinger GVA report is silent on opportunities within the Borough that merit further consideration – such as Binbury Park and Springfield Mill. While these may be open to various objections, so too is the proposed new site, Woodcut Farm.

25. The number of people living and working in Maidstone has declined from 42,009 in 2001 (based on travel to work data) to 30,693 in 2011; a reduction of 11,316 (27%). That indicates that our Borough is not seen as a good employment centre, perhaps exacerbated by the traffic congestion that is now so clearly evident.

26. Compare this situation within our Borough to the large expansion of employment opportunities in the Aylesford / Larkfield / Medway corridor and at Ashford.

27. It is our view that if, as we had advocated, the Maidstone economic area, including as it does the urban area adjoining Maidstone to the west, were considered as one unit, the nature of the debate about employment needs within Maidstone would be different.

28. Instead of talking about the failure of Maidstone to attract the right kind of employment, one would be lauding the success of the 'West Maidstone Economic Corridor' and the exciting prospects for the redevelopment of the Aylesford Paper Mill site.

29. This is precisely why the Coordinating Team has throughout the examination pressed for close co-operation between MBC and T&M so that the fact can be recognised that this is one economic, housing, employment and travel to work area, with that reflected in the way the employment needs are assessed and planned.

30. That cooperation and analysis should now be expanded to the sub-region identified by MBC's consultants, Bilfinger GVA i.e. Maidstone, Medway, Tonbridge & Malling, Swale, Ashford; and Tunbridge Wells.

31. If that analysis is carried through in a concerted and meaningful manner, we believe it would demonstrate that there is no need to designate new areas for economic development within our Borough, nor perhaps within the sub-region.

32. We believe it would demonstrate the feasibility of building upon existing major employment sites and their infrastructure and commuting patterns.

33. It should also demonstrate the increasing impact on workforce opportunities of home-working and additional rail-commuting to London and elsewhere outside the sub-region, as well as smaller, less invasive, perhaps windfall, employment sites emerging within the Borough and wider sub-region over the Plan period. (The potential for rail-commuting is explored in Attachment 2).

34. The level of commuting, both in and out of Maidstone, and the number of homes in Maidstone purchased by Londoners seeking more affordable housing than available to them within the metropolis, are examples of factors beyond the control of MBC. Also beyond its control are:

    - the number of jobs that will be lost to the march of the robot; and
    - the impact of Brexit on the number of jobs available in the South East and the country more widely, both in terms of the overall performance of the economy and the availability/willingness of immigrants from the EU to fill them in future (including the difficulty of recruiting eastern European labour for soft fruit farms).

    These factors appear not to have been taken into account in the Bilfinger GVA assessment.

35. We see no justification for MBC's fixation on creating a new employment centre at Woodcut Farm, when other opportunities within the Borough have not been considered, nor those within the wider sub-region, nor the realities of our Borough's past track record in generating successful new sites.

36. Nor do we see any justification for additional business rates accruing to MBC, derived from new employment sites within our Borough, to be allowed to distort sub-regional patterns of employment and commuting that have been established over several years.

Examination of Appendix A

37. It is recognised that Bilfinger GVA's remit was difficult, given the disparity between MBC and nearby authorities in terms of local plan timings and statistical bases.

38. However, their analysis is based on the table that is in page 7 of Appendix A of ED118. It is recreated in Attachment 1, but with additional columns inserted (highlighted yellow), clarificatory comments (in red), two additional blocks with amended projected workforce growth column (light blue) and broad summary boxes (highlighted pink).

39. The top block (Block 1) replicates the Bilfinger GVA figures, as presented in Appendix A. The figure of 1724 that gives rise to the dismissal of out-commuting from the sub-region as an issue appears at the bottom of the penultimate column on the right. Note the wide disparity between the implied ratio of the various authorities for workforce growth vs population growth as shown in highlighted column X2.

40. The middle block (Block 2) uses the minimum of that ratio across all authorities, while the lowest block (Block 3) uses the maximum.

41. A brief summary of those three blocks is:

	Block 1	Block 2	Block 3
Difference Col K	-1,724	-12,170	6,878
Non-LA residents	32,137	32,137	32,137
Intra sub-region movements	6,917	12,170	7,376
Jobs available for local residents	40,181	40,181	40,181
Total possible commuting	79,235	84,488	79,694
Jobs shortfall	9,368	-13,846	25,917

42. The figure "-1724", which is well within the margin of forecasting error, has, in effect, been used to dismiss the issue of additional commuting pressure.

43. However, commuting "leakage" in/out of the totality of the sub-region does not reflect the impact on roads and rail infrastructure <u>within</u> the sub-region i.e.

- those residents travelling within the sub-region, but to another LA; and
- many of those working <u>within a given LA</u> travelling by car, perhaps rail and, on occasion, by modally shifted buses, cycling and walking.

44. Therefore, as can be seen in the table, net extra commuting will not be 1724, but perhaps as high as 80,000 additional road/rail movements each morning and evening. Buses and car-sharing will have a secondary impact and rail will be minimal impact on road movements, as rail passengers still need to get to the station.

45. Anything like 80,000 additional morning and evening road movements would have substantial adverse impact on already stressed infrastructure and must challenge the ability of this sub-region, and Maidstone in particular, to absorb the number of projected new homes, which, in turn, drives employment requirements.

46. Even more troubling figures are those that indicate the wide variation in assessed "jobs shortfall"; utilising the range of assumptions across the authorities within the sub-region; it varies from a shortage of almost 26,000 to a surplus of almost 14,000.

47. While recognising that there will be some variation in demography between the various authorities, some or all authorities must have incorrect base assumptions, which, therefore, gives rise to a disconnect between housing need, employment need and adequacy of infrastructure.

48. Variations as wide as indicated above undermine the credibility of the Bilfinger GVA report and brings the analysis and its conclusions into serious question.

49. We believe decisions on the need for major new employment sites, rather than focusing on existing sites with capacity, cannot be taken until more-convincing evidence of need accrues.

50. There is an urgent requirement for a professional, consistent, strategic analysis of an appropriately wide area around Maidstone, before decisions are taken on major new employment sites.

51. Given the uncertainties and discrepancies between authorities, such an analysis needs to be commissioned and absorbed before MBC's submitted Local Plan is declared sound, probably after substantial further revision, or, at least, argues for considerable caution during the period up to First Review.

Office Floor-space - comments

52. A key issue in the analysis of employment is the types of job that are envisaged. Their floor-space requirements differ very substantially.

53. It has already been noted above that GVA's original report on employment prospects (February 2014, now three years old) has been characterised by GL Hearn as " …. *forecast growth in workforce jobs of 14,394 (18%) – 5,361 more than in the base forecast – this is an ambitious level of growth* ….".

54. Its statistical base is probably now open to question, given its age and the report does not deserve serious consideration, certainly not at the level of 14,400 projected new jobs.

55. That also calls into question the balance between new jobs and new homes/people, with the implications for commuting on already stressed infrastructure.

56. However, MBC's belated adoption of "windfalls when assessing office space is welcome, although the exclusions stated in paragraph 2.10 again signal a very conservative approach.

57. Appendix A, paragraph 1.27 states (our highlighting):

> *"Given trends in out-commuting to London (which have increased from most boroughs between 2001 and 2011) as well as significant jobs growth planned in other locations that are easily accessible (for example Ebbsfleet, London Paramount, Discovery Park) it is likely that the additional 1% in potential out-commuting would be absorbed elsewhere".*

58. This indicates that, if MBC or some other body were to take a strategic view across an area wider than our Borough, very different conclusions may be reached on current locations for new employment, as well as the amount of land needed to accommodate them.

59. Closer to-hand, our team has already noted that there has been insufficient consideration of the merits or otherwise of, say, Aylesford, Binbury Park, Springfield Mill and Ashford sites, as opposed to a major dependency on Woodcut Farm, in which MBC Officers are persisting, despite Planning Committee Members' reservations and refusal.

60. Employment locations demand a strategic review across a far wider area than our Borough, with commuting, and hence infrastructure considerations, being taken into full account.

Need for Review

61. In the light of all the evidence outlined above, it would, in our view, be wholly wrong to press ahead with allocating more land for employment until further, objective studies are carried out as to the requirement for new jobs and, as required, availability and suitability of sites across the sub-region and, in particular, the MBC/T&M areas, taking full account of London and other effects.

62. Such studies would inevitably involve some delay, but, given the political will and the necessary resources, it need not take an age. More time arriving at the right decision would be time well spent. It would also provide the opportunity to:

   a) arrive at consistent analytical methods between authorities (perhaps not only for assessing workforce growth, but also the need for new homes);
   b) revisit the estimates for job creation;
   c) review the effect of the London jobs market and other factors having an impact on the sub-region's requirement for jobs within its boundary;
   d) in particular, re-open discussions with T&M over the long-term use of the former Aylesford Paper Mill site and with Ashford, given its previous growth aspirations and large infrastructure investment;
   e) undertake an in-depth assessment of why sites such as Junction 7 have failed to achieve their objectives, to identify the lessons to be learnt and to adjust plans accordingly; and
   f) review intra-borough candidate sites e.g. Waterside Park, Woodcut Farm, Springfield Mill and Binbury Park – together with any others which may surface during such a review.

63. Only by bringing all these strands together can the residents of Maidstone, and, indeed, the wider sub-region, be assured that a proper strategic approach has been adopted towards jobs provision, that the basis of calculation for future employment growth are sound and, for Maidstone, that all possible options for employment sites within and outside the Borough have been considered.

64. This very unsatisfactory situation argues for:

   - the plan, as currently drafted, to be declared unsound; or
   - If that is not accepted, key proposed developments to be frozen until the First Review demonstrates need and site sustainability, including infrastructure. That freeze may need to encompass some proposed housing developments, as well as employment sites, given the linkage between them.

65. That way forward is lent weight by probable changes to NPPF / NPPG as a result of DCLG's White Paper, which will reinforce the impression that MBC has "not got it right" and that damage to our Borough should be minimised until First Review. By that time, the "searchlight" on MBC and on developers, and on collaboration with other authorities, should engender a more realistic and realisable development plan for Maidstone as part of its sub-region.

Coordinating Team

Source – page 7, Appendix A from ED118, with additional workings *Attachment 1*

	Work Column: years (by inspection)	Projected homes dpa	Projected homes over respective periods	Projected population growth	Work column: workforce growth to popn growth ratio	Projected workforce growth	Projected jobs growth	Work Column: take average	2011 out-commuting	2011 residents working in LA (%)	2011 LA jobs taken by LA residents (%)	Workforce driven local jobs required	Jobs growth taken by non- LA residents	Remaining Jobs growth available for Local Residents	Difference (i.e. shortfall, or, if -ve, surplus on local requirement)	Absolute difference
	X1	A		B	X2	C	D		E	F	G	H	I	J	K	X3
												Col F * Col C	Col D*(1-Col G)	Col D - Col I	Col H - Col J	
Maidstone (2011-31)	20	928	18,560	33,811	0.51	17,300	14,400		31,239	50%	51%	8,650	7,056	7344	1306	1306
Swale (2014-31)	17	776	13,192	25,000	0.31	7,870	10,900		22,825	55%	69%	4,329	3,379	7521	-3193	3193
Ashford (2011-31)	20	727	14,540	25,487	0.50	12,700	12,600		17,981	47%	49%	5,969	6,426	6174	-205	205
Tonbridge & Malling (2011 – 31) (Take average)			0				7,400								0	
	20	646	12,920	23,635	0.53	12,500	8,700	8050	30,624	29%	29%	3,625	5,716	2335	1291	1291
Tunbridge Wells (2013 – 33)	20	648	12,960	19,210	0.45	8,640	9,168		42,477	50%	52%	4,320	4,401	4767	-447	447
Medway (2012-37)	25	1281	32,025	58,600	0.39	22,676	17,200		50,528	51%	70%	11,565	5,160	12040	-475	475
Whole Economic Area		5,006	104,197	185,743		81,686	72,318		195,674			38,457	32,137	40,181	-1,724	6,917
				Average	0.45											
				Maximum	0.53											
				Minimum	0.31											

Movements in/out LA	
Non-LA residents - Col I	32,137
Absolute difference Col X3	6,917
TOTAL movements between Las	39,054
Jobs for local residents	40,181
Projected Workforce growth Col C	81,686
Projected jobs growth Col D	72,318
Jobs gap	9,368

ADJUSTED to MINIMUM for workforce growth : popn growth ratio (column X3)

	Work Column: years (by inspection)	Projected homes dpa	Projected homes over respective periods	Projected population growth (as above)	Work column: workforce growth to popn growth ratio using above minimum	Amended Projected workforce growth (revised to X2 ratio)	Projected jobs growth	Work Column: take average	2011 out-commuting	2011 residents working in LA (%)	2011 LA jobs taken by LA residents (%)	Workforce driven local jobs required	Jobs growth taken by non- LA residents	Remaining Jobs growth available for Local Residents	Difference (i.e. shortfall, or, if -ve, surplus on local requirement)	Absolute difference
	X1	A		B	X2	C	D		E	F	G	H	I	J	K	X3
												Col F * Col C	Col D*(1-Col G)	Col D - Col I	Col H - Col J	
Maidstone (2011-31)	20	928	18,560	33,811	0.31	10,644	14,400		31,239	50%	51%	5,322	7,056	7344	-2022	2022
Swale (2014-31)	17	776	13,192	25,000	0.31	7,870	10,900		22,825	55%	69%	4,329	3,379	7521	-3193	3193
Ashford (2011-31)	20	727	14,540	25,487	0.31	8,023	12,600		17,981	47%	49%	3,771	6,426	6174	-2403	2403
Tonbridge & Malling (2011 – 31) (Take average)							7,400								0	
	20	646	12,920	23,635	0.31	7,440	8,700	8050	30,624	29%	29%	2,158	5,716	2335	-177	177
Tunbridge Wells (2013 – 33)	20	648	12,960	19,210	0.31	6,047	9,168		42,477	50%	52%	3,024	4,401	4767	-1744	1744
Medway (2012-37)	25	1281	32,025	58,600	0.31	18,447	17,200		50,528	51%	70%	9,408	5,160	12040	-2632	2632
Whole Economic Area		5,006	104,197	185,743		58,472	72,318		195,674			28,011	32,137	40,181	-12,170	12,170

Movements in/out LA	
Non-LA residents - Col I	32,137
Absolute difference Col X3	12,170
TOTAL movements between Las	44,307
Jobs for local residents	40,181
Projected Workforce growth Col C	58,472
Projected jobs growth Col D	72,318
Jobs gap	-13,846

ADJUSTED to MAXIMUM for workforce growth : popn growth ratio (column X3)

	Work Column: years (by inspection)	Projected homes dpa	Projected homes over respective periods	Projected population growth (revised to X2 ratio)	Work column: workforce growth to popn growth ratio using above maximum	Amended Projected workforce growth (revised to X2 ratio)	Projected jobs growth	Work Column: take average	2011 out-commuting	2011 residents working in LA (%)	2011 LA jobs taken by LA residents (%)	Workforce driven local jobs required	Jobs growth taken by non- LA residents	Remaining Jobs growth available for Local Residents	Difference (i.e. shortfall, or, if -ve, surplus on local requirement)	Absolute difference
	X1	A		B	X2	C	D		E	F	G	H	I	J	K	X3
												Col F * Col C	Col D*(1-Col G)	Col D - Col I	Col H - Col J	
Maidstone (2011-31)	20	928	18,560	33,811	0.53	17,882	14,400		31,239	50%	51%	8,941	7,056	7344	1597	1597
Swale (2014-31)	17	776	13,192	25,000	0.53	13,222	10,900		22,825	55%	69%	7,272	3,379	7521	-249	249
Ashford (2011-31)	20	727	14,540	25,487	0.53	13,479	12,600		17,981	47%	49%	6,335	6,426	6174	161	161
Tonbridge & Malling (2011 – 31) (Take average)					0.53	0	7,400								0	
	20	646	12,920	23,635	0.53	12,500	8,700	8050	30,624	29%	29%	3,625	5,716	2335	1291	1291
Tunbridge Wells (2013 – 33)	20	648	12,960	19,210	0.53	10,160	9,168		42,477	50%	52%	5,080	4,401	4767	313	313
Medway (2012-37)	25	1281	32,025	58,600	0.53	30,992	17,200		50,528	51%	70%	15,806	5,160	12040	3766	3766
Whole Economic Area		5,006	104,197	185,743		98,235	72,318		195,674			47,059	32,137	40,181	6,878	7,376

Movements in/out LA	
Non-LA residents - Col I	32,137
Absolute difference Col X3	7,376
TOTAL movements between Las	39,513
Jobs for local residents	40,181
Projected Workforce growth Col C	98,235
Projected jobs growth Col D	72,318
Jobs gap	25,917

1. This Attachment is offered as perspective on this form of sustainable transport.
2. Within the Borough, MBC's figure of 1,306 more workers than jobs assumes 2011 commuting patterns. But the Bilfinger GVA report states in paragraph 1.22 that:

   > *"It is anticipated that commuting to London will continue to increase from Maidstone and neighbouring authorities considering the significant employment role of London and the strong public transport connections already in existence."*

3. To which one might add the provision of a new service from Maidstone East to Cambridge planned for 2018.
4. Attachment 3 indicates that the total number of rail passengers leaving stations within the Borough during 2015-16 was circa 5.3 million for the whole year. Judging by the fact that just over two-thirds paid full-fare or used season tickets and allowing for 225 working days per annum, it implies that circa 16,000 persons rail-commuted out of Maidstone Borough for regular work.
5. It must be noted, that a proportion of those rail passengers will have driven into the Borough to reach a rail station, adding to the stress on our Borough's roads.
6. Given that rail out-commuting from the Borough increased by almost 15% over the past decade (please see Attachment 3), it may increase by, say, 20% over the remaining period to 2031 – or some 3,000 new rail commuters.
7. This, of course, takes no account of increases in commuting journeys by car, coach / bus or cycle, although the last is likely to be very small. What is clear is that an assumption that out-commuting will stay at 2011 levels (which coincided with the peak of unemployment post-2008 financial crisis) must be wrong.
8. For the sub-region as a whole, Attachment 3 indicates that the figure for new rail commuters could be 10,000 by 2031, but, of course, that is dependent upon rail capacity and there may be some double-count with intra-region rail commuters and those travelling into the Borough to reach a rail station.
9. What is evident is that, although increased rail-commuting will have a role in matching workforce with jobs, it would be a small portion of the overall increase in workforce derived from the high number of planned new houses.
10. Rail commuting does not stand scrutiny as a determinant for strategic location of new houses.
11. If a logical connection is made between rail stations and locations for new homes, it ignores the problem of getting to the rail station and then, if arriving by car, parking. Given the spread of homes, additional bus services would only play a minor role in alleviating infrastructure stress.

Rail Commuting – source Office of Rail Regulation

Attachment 3

Station Name	Entries_Full	Entries_Reduced	Entries_Season	Entries_Total	Exits_Full	Exits_Reduced	Exits_Season	Exits_Total	1516 Entries & Exits	1415 Entries & Exits	Entries_Total 2005-06	Entries - total increase over 10 years
Aylesford	17,812	14,815	25,030	57,657	17,812	14,815	25,030	57,657	115,314	115,906	**40,493**	42.4%
Barming	17,284	18,889	32,008	68,181	17,284	18,889	32,008	68,181	136,362	129,926	59,793	14.0%
Bearsted	27,595	63,877	107,651	199,123	27,595	63,877	107,651	199,123	398,246	396,840	162,998	22.2%
East Farleigh	4,385	4,429	6,988	15,802	4,385	4,429	6,988	15,802	31,604	29,312	8,495	86.0%
East Malling	7,446	11,828	31,645	50,919	7,446	11,828	31,645	50,919	101,838	99,628	46,625	9.2%
Harrietsham	9,132	9,906	18,437	37,475	9,132	9,906	18,437	37,475	74,950	74,412	32,248	16.2%
Headcorn	40,322	102,378	162,449	305,149	40,322	102,378	162,449	305,149	610,298	612,206	281,328	8.5%
Hollingbourne	4,482	8,005	12,847	25,334	4,482	8,005	12,847	25,334	50,668	46,554	14,412	75.8%
Lenham	12,376	16,505	20,309	49,190	12,376	16,505	20,309	49,190	98,380	108,194	81,048	-39.3%
Maidstone Barracks	27,684	49,325	56,252	133,261	27,684	49,325	56,252	133,261	266,522	270,645	1,247	10585.9%
Maidstone East	138,944	247,563	282,325	668,831	138,944	247,563	282,325	668,831	1,337,663	1,358,356	460,384	45.3%
Maidstone West	86,256	153,687	175,267	415,211	86,256	153,687	175,267	415,211	830,421	843,268	620,706	-33.1%
Marden	27,388	60,325	161,173	248,886	27,388	60,325	161,173	248,886	497,772	480,498	118,501	110.0%
Staplehurst	58,435	135,691	234,747	428,873	58,435	135,691	234,747	428,873	857,746	888,016	423,349	1.3%
Tonbridge	345,572	662,803	1,160,280	2,168,655	345,572	662,803	1,160,280	2,168,655	4,337,310	4,207,328	1,975,094	9.8%
Wateringbury	6,354	8,147	9,150	23,651	6,354	8,147	9,150	23,651	47,302	47,976	22,579	4.7%
West Malling	73,425	140,862	193,785	408,072	73,425	140,862	193,785	408,072	816,144	782,090	291,247	40.1%
TOTAL	**904,892**	**1,709,035**	**2,690,343**	**5,304,270**	**904,892**	**1,709,035**	**2,690,343**	**5,304,270**	**10,608,540**	**10,491,154**	**4,640,545**	**14.3%**
											p.a. increase	1.35%
Days per annum	225								47149	46627		
Per day	4022	7596	11957	23575	4022	7596	11957	23575	23575	23314	20625	14.3%

Total entries	**2015-16**
Medway	4,927,538
Tonbridge and Malling	3,448,806
Swale	2,288,521
Ashford	2,157,314
Tunbridge Wells	3,099,532
Maidstone	2,544,644
TOTAL	**18,466,355**
Commuting per day	**82,073**

There are several features of this White Paper that are relevant to MBC and its approach to, and preparation of, this Local Plan; the table below lists some key points.

	Page / Para	**Key Point**	**Comment**
1.	**22**, 1.2 & 1.12-1.16	Standard methodology for assessing housing requirements.	We do not believe that MBC has applied NPPF / NPPG guidelines correctly, in particular not allowing for past oversupply. We hope this proposed methodology will be clear on such permitted corrections to raw population statistics.
2.	**22**, 1.3	Involving the local community.	Very welcome, as MBC's engagement has been little and reluctant.
3.	**23**, 1.8	Plan update every 5 years.	Very welcome and the Inspector's Interim Findings are compatible with this. MBC has been very slow in its Local Plan preparations and this would be a welcome obligation.
4.	**23**, 1.9	Working with neighbouring authorities.	Duty to Cooperate has not worked. Any pressure to remedy that situation would be very welcome.
5.	**25**, 1.24 – 1.25	Use of Brownfield land	Weighting this above greenfield is welcome.
6.	**29**, 1.41 – 1.44	Neighbourhood Plans	This would add weight to Neighbourhood Plans, which MBC has been reluctant to do.
7.	**37**, 2.14	Planning Department resources	This is a welcome recognition of the lack of resource and expertise.
8.	**38**, 2.17	Deterring planning appeals	This would re-balance the "contest" between applicants and those opposed to the applications.
9.	**42**, 2.36 – 2.46	Transparency during build-out	Once an application has been granted, this would give greater assurance that it would be utilised in an expeditious manner.
10.	**43**, 2.47 – 2.51	Housing delivery test	This would sharpen up the authority's side of the situation.

If, a few years ago, NPPF / NPPG had been re-drafted in line with what the above indicates to be a possibility, we believe that our Local Plan would have had a more compelling vision and a cohesive and consistent approach to the planning of homes, jobs and infrastructure within the context of the whole sub-region.