



Ms C Smith
Planning Policy
Regeneration, Community and Culture
Medway Council
Gun Wharf
Dock Road
Chatham
ME4 4TR

21st June 2018

By email only

Dear Catherine

Future Medway: Development Strategy Consultation

Thank you for allowing us the opportunity to respond to the consultation on the Medway Development Strategy consultation.

We recognise the constraints facing Medway Council in the development of a new Local Plan, but CPRE maintains that the Government's proposed methodology for calculating Local Housing Need is fundamentally flawed. The methodology is based on market demand rather than actual needs; it provides no understanding of how Local Plans can reflect a move from these abstract targets to a realistic, deliverable and sustainable housing requirement. Across the wider South East and particularly in Kent the methodology is leading to disproportionately elevated targets which, in reality, will prove impossible to deliver in a sustainable manner.

We therefore offer our robust objection to Scenario 3.

In general CPRE supports development strategies that meet the following criteria:

- Prioritise the re-development of appropriate brownfield sites
- Do not lead to the loss of best and most versatile agricultural land, Green Belts, AONBs and other protective designations

The Kent Branch of the Campaign to Protect Rural England exists to promote the beauty, tranquility and diversity of rural England by encouraging the sustainable use of land and other natural resources in town and country.

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- Make the best use of available land (in the context of Medway this would mean a very tight focus on urban regeneration at relatively high densities, making best use of infrastructure, services and public transport links)
- Recognises the acute need for rural affordable housing

We therefore welcome Medway Council's renewed commitment to delivering regeneration of brownfield sites, but we retain significant concern at the inclusion of Lodge Hill as one of the strategic options.

We acknowledge the presence of a residual brownfield footprint at the Lodge Hill site, but the NPPF is clear that PDL should be re-used '*provided it is not of high environmental value*'. The site's designation as a SSSI clearly precludes it from being realistically considered as still being a brownfield site. The masterplan indicates significant building incursion on the SSSI, and earlier work in support of the withdrawn application has made it clear that it will not be possible to adequately mitigate harm to an internationally important population of nightingales. We therefore also robustly object to Scenario 4.

With regard to the remaining Scenarios, we consider that any focus of development at Hoo St Werburgh must respect the need to be broadly supported by the local community, and must deliver genuinely affordable housing for local needs as well as appropriate reinforcement of the necessary infrastructure and services. We note that Scenario 3 would "*...require a reliance on ... achieving high densities in appropriate areas*" but suggest that this reliance should also be a prerequisite of Scenarios 1 and 2.

In arriving at housing targets, considerable weight must be given to the very real environmental constraints which exist – not least the fact that the whole of the wider south east is classified by the Environment Agency as '*severely water stressed*'. We note that the SHMA found that Medway has a high requirement for affordable housing: in the light of such constraints, this must be an appropriate point for the Council must proactively seek innovative ways to provide homes in which its community can genuinely afford to live, rather than relying on elevating market housing targets in the hope of cross-subsidising affordable provision.

Finally we note the welcome policy intention (para. 7.35) to address the protection of the unusually tranquil (and locally scarce) areas that exist in the north of the peninsula. We would strongly support robust policies that articulate this protection, and draw your attention to the tranquillity mapping undertaken by CPRE (full map available here: <http://www.cpre.org.uk/resources/countryside/tranquil-places/item/1812>).

Yours sincerely,

Hilary Newport
Director