

## MEDWAY CORE STRATEGY – RESUMED HEARING 22 MAY 2013

### STATEMENT BY BRIAN KINGSLEY SMITH AND HARRY DEAKIN

#### 1. INTRODUCTION

We have made a number of representations before and during the process of Examination and we note that the Inspector intends to take account of such matters. We therefore do not repeat earlier submissions and have tried to summarise the treatment of issues in this statement.

#### 2. ISSUES IDENTIFIED BY THE INSPECTOR FOR HEARING ON 22 MAY 2013

1a) SEP Revocation. There are few implications for Medway in the revocation. The SEP offered a distorted view of Medway's role in Thames Gateway; eg. Policy KTG2, (iii), (iv), and (vi), which Medway Council's policies and actions have made unrealistic of achievement.

1b) i) We make no comment on the technical and specialist aspects of the SSSI issues. Our previous representations show however that the alleged advantages of development of Lodge Hill for Medway have been consistently overstated and its inherent problems treated with excessive optimism; it is therefore not realistic to assume that any harm to SSSI interests could be outweighed by wider benefits of development there.

ii) The inevitable loss of, or at least significant delay in provision of, the planned 44,110 B1/B2 employment space at Lodge Hill exacerbates other recent losses such as Cliffe Industrial area, half of Chatham Docks and 3,000 B2 at Halling Cement Works. Our opposition to the Core Strategy has, from the beginning, been centred on its failure to address the economic, deprivation and out commuting problems identified in, but unaddressed by, the Core Strategy

1c) We rest on our earlier representations.

#### 2. Mitigation and Compensation

2(a) and 2(b)(i) Specialist issues; no comment

2(b)(ii) Even a small time lag in achievement of replacement habitat simply adds to the problems inherent in delivering and coordinating the mix of development the Strategy claims for Lodge Hill. There is a good deal of experience of such large development schemes in Kent and all have shown similar characteristics: eg much more time than predicted to deliver; frequent changes of content and design; end result fundamentally different from initial intentions. If successful, the scheme would eventually put pressure on surrounding land thus storing up further conflict. That is not to deny the possible advantages of large schemes, but they need to take their place in an overall realistic strategy of development, which in Medway demands rapid delivery of sites for housing and industry and business, ie sites that are available, economic to develop, and offering secure viability; not requiring large concomitant infrastructure. With or without the SSSI problem, Lodge Hill cannot offer that.

### 3. SA Addendum

For the purposes of this statement we take items 3i) and ii) and 4 together. As to the general question in 3a) we rely on our commentary previously submitted where we set out detailed evidence that the SA Addendum fails to provide a robust assessment of alternatives; that there are alternatives that should have been examined, including a dispersed pattern of sites; that Medway Council failed in its duty of effective cooperation with neighbouring authorities and that such cross-boundary cooperation has particular significance for Medway; that the assessment has an inherent bias in favour of large sites and Lodge Hill in particular; that the positive scores given to Lodge Hill are generally overstated including how much previously developed land it can offer; that the assessment applied a preference for use of previously developed land excessively (copying similar mistaken application by the Council over decades) rather than the policy of preference as stated in NPPF and in previous Government policy.

### 3. CONCLUSION

The Inspector will be aware that the matters referred to in this statement reflect a perspective of over two decades of Medway Council's failure to provide a realistic planning basis for Medway's needs. In that time Medway's fortunes have declined alarmingly. The last Core Strategy submitted for examination was found to be unsound by the Inspector in 1997; six years later this one is no better and in essence is little different. In place of the aspirational and often unrealistic notions the Council advances, of which there are many examples, Rochester Riverside being one, Medway urgently needs practical proposals for a supply of development opportunities able to be realised quickly and economically. Ambitious schemes such as Lodge Hill have their place at an appropriate time (given resolution of the SSSI issue although even if the notification were to be set aside, Lodge Hill would remain of high environmental value and its development would be contrary to NPPF paragraph 111. The Council's public response to that issue has been to complain of a "flock of birds" being allowed to disrupt its plans for the benefit of the town; in reality it is the protracted absence of any realistic plan that has created the current problem. Not only does Medway require development land now, it is in urgent need of effective measures to tackle excessive out-commuting, and transport problems which focus on Chatham town centre and for which the submitted strategy offers no solution .

We are driven by these considerations and their history over the past two decades to question whether the Council is able or has the will to abandon its adherence to unrealistic and mistaken planning policies and advance a strategy that could meet Medway's needs. Its approach appears to have been influenced by a strong desire to avoid all greenfield development that might affect areas peripheral to the main urban complex, which has produced an undue emphasis on previously developed sites, many of them unsuitably located, requiring public subsidy and inherently unattractive to developers. A drastic loss of small industrial and business sites is another effect.

We previously suggested that, rather than simply declare to Core Strategy unsound, it might be better to abandon it in favour of preparing a local plan, but we now doubt whether that course would not simply lead to further protracted delay, with no satisfactory outcome. **The Inspector is urged to give forthright reasons why the Core Strategy is unsound before the Council again has any opportunity to withdraw the Strategy.**

Brian Kingsley Smith and Harry Deakin

26<sup>th</sup> April 2013