

MATTERS AND ISSUES FOR HEARING 22nd MAY 2013

1) Policy Context:

a) Core Strategy, para 19.5, refers to locational effects on the Core Strategy and relates to policies, ie concentration of new dwellings, employment and services in major locations and in the urban area – reference being made to Riverside and defence land at Chattenden – the revocation of the South East Plan is limited. Medway is a Unitary Authority and is therefore responsible for its own Housing Allocation. Designation of Lodge Hill as a Housing Site – given the impact on the SSSI – alternatives should have been sought at an early stage, ie Riverside site, in terms of Employment, Services and Accessibility. Many opportunities within the existing town centres generally – which (with the exception of Rochester) are somewhat shabby and run down – which calls for a concentration within their perimeters and NOT on a greenfield out-of-town site.

b) Clearly the impact of such a large Development must be detrimental, especially for the nightingale population and the protection of the SSSI's.

c) In our view there is conflict between the two Policies.

Policy 6 "Development which will cause UNACCEPTABLE harm will not be permitted.

Page 124. We do not need another – quote "Well defined Town Centre within the Hoo Peninsula" – Hoo is already in situ. We do not need Floor and Office space as described in the Application. Medway already abounds with empty office and floor space – Medway needs Green Open Space.

2) Mitigation/compensation measures:

a) No – this compensatory policy is unacceptable. Mitigation is far from proven; no evidence of success forthcoming. "Nightingale Habitat Creation" (received 27th April, though dated 13th January), the only tenuous possibilities are far from Medway – no benefit locally – in fact it is deprivation. We call attention to the Development Brief for Lodge Hill, Page 47 paras 2.70, 4.71, 4.72, 4.73 "The importance of habitat within the Hoo Peninsula". The Nightingale Population returns to the same breeding sites – simplistic to assume otherwise.

b) Compensatory Measures are not acceptable – we note with concern BTO's theoretical claim as being unproven in practical experience – for achieving success in Kent – does not include Medway.

i) We consider that the amount of Compensatory Land is unquantifiable – because this site contains many other protected species of flora and fauna eg Butterflies. This site has been largely undisturbed for decades. At the beginning of the twentieth century it was mentioned in *Archaeologica Cantiana* as being of national importance for rare flora and fauna to be found there. We do not believe that good agricultural land need be lost – the Hoo Peninsula already has the highest acreage of Grade A land in the UK – the fertility of such land is often linked with flora and fauna nearby.

ii) We do not believe the consequences of delay or removal of Lodge Hill will have any significant effect on Housing provision. Medway has ample provision at the present and for years to come, and bearing in mind its poor infrastructure generally.

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b) We cannot comment on MG5 Grassland – we have not received any Data on the subject.

3. SA Addendum

i) In our view the Local Authority should have realized the risk and obvious drawbacks of developing Lodge Hill much earlier in the process; they have not addressed other alternatives sufficiently and have no robust contingency plan. The Association is still firmly of the view that there has been over-allocation for Housing development and the Local Authority have paid insufficient regard to accommodating more residential development in existing centres. Large dispersed developments are not sustainable with increased traffic pressures and other infrastructure strains.

ii) Para 182 of the NPPF requests a Local Plan to be “positively prepared to ensure its boundaries”. It must be prepared in accordance “with the duty to co-operate” which means neighbouring Authorities and any available sites alternative to Lodge Hill in Medway and nearby. We repeat our earlier criticism to the Core Strategy Appraisal – we did not find much of the content re-assuring or even justified, based largely on assumptions; in fact we question much of the data therein.

4. a) We refer to Annex 2 of the NPPF which refers to land occupied by permanent structures, including the curtilage of the developed land – very little of Lodge Hill land was occupied by permanent structures and therefore does not meet the definition. This land is of high environmental value – far outweighing any commercial value.

b) Annex 2 NPPF. This land is of priceless high environmental value with no option for development.

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Chairman – Frindsbury & Wainscott Community Association

30th April 2013