



RSPB Statement – Medway Core Strategy Examination

Participant ID: 65

Matters and Issues for Hearing Wednesday 13 June 2012

Matter 3: Housing supply and location

a) Will the strategy deliver the number of new homes required to meet the RS requirements/ identified needs?

Yes. Based on our understanding of the information available from the Council the RSPB considers that the strategy could be delivered without a strategic allocation at Lodge Hill (see RSPB submission on Matter 5). Although the deletion of the Lodge Hill allocation might lead to an initial shortfall in total allocations, we note that the Council's own SLAA has identified more sites than are necessary for the Core Strategy period (a total of 3293, paragraph 8.05 of the 2010 SLAA) and has taken no account of windfalls. We also note that the Council stopped its search for sites at this point (paragraph 4.06 of the 2010 SLAA). The level of windfalls needed to address the overall shortfall represents 7% of the Council's overall housing target (including a 5% uplift as required by paragraph 47 of the NPPF)(figures taken from table 5 of the 2012 SLAA, *Medway Housing Targets 2006-2028*). However, we note from the 2012 SLAA that the projected windfall for 2011/12 stands at 9.9% of the projected completions (also table 5). In the absence of compelling evidence to the contrary, we consider that such a reliance on windfall housing would not render the Core Strategy unsound.

We note that from the 2010, 2011 and 2012 SLAAs that the Lodge Hill allocation becomes most crucial as an overall proportion of the Council's housing trajectory in the final 5 years of the plan. We consider that this gives the Council ample time to identify replacement sites.

We also note from the Council's Local Development Scheme (2011) that work on a subsequent Site Allocations and Development Management document is not intended to start until after the examination in public of the Core Strategy (LDS, paragraph 5.1). We consider that this subsequent period of plan preparation should give the Council sufficient scope to address any potential shortfalls arising from the deletion of the Lodge Hill allocation.

b) Are the locations identified for the supply of new housing the most appropriate when considered against all reasonable alternatives?

The RSPB has profound concerns about the impact of the proposed allocation at Lodge Hill. These concerns are set out in detail in our submission in relation to Matter 5 (Lodge Hill Strategic Allocation), but in summary we consider that the proposal for 5000 houses at this location will be undeliverable, and that therefore the allocation of this strategic site is not the most appropriate. We consider that this allocation makes the Core Strategy unsound and consequently we recommend its deletion in order to make the Core Strategy sound.

c) Is there a reasonable prospect that the identified sites are deliverable/developable during the plan period, particularly those sites that have been carried forward from the local plan?

Please see our comments on Matter 3b above and Matter 5. Development at Lodge Hill will be entirely dependent upon currently unproven mitigation and compensation measures.