

Matter 2 - Vision, Spatial Development Strategy and Strategic Objectives

Issues

Whether the Plan identifies a clear Vision and Spatial Development Strategy for Medway that are positively prepared, justified, effective and consistent with national policy.

Whether the Strategic Objectives are clear, positively prepared, justified, effective and in accordance with national policy.

Questions

Strategic Objectives

2.10 The Plan sets out that the spatial distribution of new development within Medway is circa. 40% urban regeneration; circa 30% suburban and circa 30% rural (mainly on the Hoo Peninsula). Please could the Council explain, with reference to the evidence submitted, how and why this spatial distribution is the most sustainable, deliverable and therefore appropriate approach to the delivery of new development during the Plan period.

CPRE Kent's overriding objection is that Medway Council has selected a spatial strategy that prioritises the allocation of greenfield sites, rather than taking a true brownfield first strategy.

The Council has not undertaken a targeted call for brownfield sites. Many other Councils in Kent have. This has resulted in a strategy that is overly reliant on greenfield sites (which are not sustainably located and are therefore reliant on the private car). In addition, density is not optimised, resulting in low site yields and the need for additional greenfield release.

We also remain of the view that loss of green belt and best and most versatile agricultural land should be minimised.

As set out in our response to Matter 1, it is clear that the spatial distribution of development has been pre-determined and does not have sufficient regard to the Council's evidence base.

The Sustainability Appraisal (A3.1) states that the worst performing spatial development option is the Hoo Peninsula, ranking lowest against a number of SA objectives (see table 5.5.4)

Of particular concern is the 30% of new development being allocated mainly on the Hoo Peninsula. This area has significant environmental value with its ancient woodlands,

The Kent branch of the Campaign to protect Rural England exists to protect the beauty, tranquillity and diversity of the Kent countryside

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SSSIs, SAC, SPA and RAMSAR sites. It is also predominately best and most versatile agricultural land and has significant areas of intrinsically dark skies, the loss of which should be strongly resisted in terms of impacts on biodiversity interests and our own wellbeing.

The Council's Strategic Transport Assessment, Mode Share Strategy (B18.3) states that there will only be a 10% reduction in modal share of all trips by car (from 70% to 60%) for development on the Hoo Peninsula (as a consequence cycling/LCWIP and Bus Rapid Transit initiatives) (Tables 2 and 3).

Of the scenarios tested the best performing (Tables 4 and 5) are where LCWIP routes, internalisation (sustainably located development close to key trip attractors and designations – eg train stations) and Bus Rapid Transport are in place by 2031.

On this note the Infrastructure Delivery Plan (B2) indicated that the LCWIP routes have been funded, but the Bus Rapid Transit, which is marked as critical infrastructure, has yet to be confirmed in terms of the delivery body, cost and funding source.

This raises two issues. First, that 60% of new development on the Hoo Peninsula will be car dependant in any event, and second, that this car dependency will be baked-in by the time by the time the Bus Rapid Transit (and LCWIP) come online.

As the Transport Assessment sets out, internalisation (being a combination of existing infrastructure, proximity to train stations, for example and new employment sites) is critical in the selection, planning and design of new settlements and urban extensions. Furthermore, distance from key trip attractors and destinations creates “barriers to walking, cycling, wheeling and the use of public transport for shorter local trips.”

Proposed development on the Hoo Peninsula is not sustainably located and will damage the environmental quality of the area. This demonstrates that the Council's spatial strategy is not underpinned by its own evidence base.