

RSS EXAMINATION IN PUBLIC SOUTH EAST

STATEMENT BY CPRE KENT: PARTICIPANT 7150

MATTER 8Cii – THAMES GATEWAY: HOUSING

8Cii.1 Is the overall housing provision at the right level having regard to the status of the sub-region as part of a Growth Area, as well as local constraints, opportunities and building rates (KTG1)?

The Thames Gateway was identified a Growth Area very largely because it provided substantial reserves of urban brownfield land and therefore an opportunity to substantially increase housing supply without encroaching on greenfield land. The brownfield percentage across the sub-region should therefore be substantially higher than the regional average (60%), reflecting the greater availability of urban brownfield land. Indeed, for that reason, the Government has adopted a target that, across the Thames Gateway, the brownfield percentage should be 80%¹. Within the Thames Gateway Growth Area, therefore, the need to maintain the brownfield percentage substantially above the regional average, and the need to support the 80% Thames Gateway-wide target, constitutes a legitimate constraint on acceptable build rates. .

However, it is not clear that this constraint is reflected in the figures proposed in Policy KTG1. This is despite the fact that paragraphs 2.1-2.7 suggest that the figures may indeed have been limited in order to reflect the intention to minimise encroachment on greenfield land, and the pace of delivery of the requisite water supply, drainage and other infrastructure. If that is the case, then this is encouraging, but does not necessarily provide assurance that encroachment onto greenfield land will be minimised. However, the figures would be easier to accept if:

- (a) the sub-regional brownfield target was made clear, giving substance to the intention to minimise encroachment on greenfield land and supporting the Government's 80% target; and
- (b) RSS included a policy making the build rates presented in Policy KTG1 conditional on the sub-regional brownfield target (and therefore also the Government's 80% target) not being undermined.

We therefore propose that Policy KTG1 is amended so as to provide that reassurance.

8Cii.5 Is the approach to brownfield land in Policies KTG3i and KTG7v justified by the evidence?

KTG3i simply supports the sequential testing of sites so as to prioritise previously-developed sites over greenfield sites. As such, it is consistent with the national policy objectives of countryside protection and urban regeneration promoted - principally - through PPG3. However,

¹ *Creating sustainable Communities: Delivering the Thames Gateway*. ODPM, March 2005.

given that the Thames Gateway is a regeneration area, the re-use of urban brownfield land is all the more a priority. The objectives of urban regeneration and countryside protection in the Thames Gateway are reiterated in *Creating sustainable Communities: Delivering the Thames Gateway* (ODPM, March 2005):

'we must seize the opportunity offered by this huge area of brownfield land and bring it back into productive use.' (Page 2)

and

'Our key principles are to...return derelict and contaminated brownfield land to productive use'. (Page 7)

Policy KTG7v, however, calls for the sequential approach to be overlooked *'where there are clear planning advantages from the development of urban extensions or new community'*.

RSS should be much clearer as to what is meant by 'planning advantages' in this context. Otherwise, there will be significant uncertainty as to where urban extensions or new community may be appropriate or inappropriate. There is also a risk that the planning advantages of observing the sequential approach will be foregone without adequate justification. RSS should make it clear that, for the sequential approach to be over-ridden, the 'planning advantages' to which it refers must be of sufficient magnitude to outweigh the planning advantages presented by using previously developed urban land and buildings (e.g. improving the urban environment and economy; reducing the need to travel; and protecting the countryside).