



Ms C Smith
Planning Policy
Regeneration, Community and Culture
Medway Council
Gun Wharf
Dock Road
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ME4 4TR

29 February 2016

Dear Ms Smith

Medway Council Local Plan: Issues and Options 2012 - 2035

Thank you for consulting CPRE Kent on the above document.

As a general point, we are pleased to see the Council consulting the Community at this early stage in the preparation of the Medway Council Local Plan.

There are a large number of questions in the document and it has not been possible to respond to each in the time available. CPRE Kent has concentrated on a selection of the questions, but must confirm that the absence of a detailed answer does not infer that the issue is not one of interest to CPRE. CPRE may comment on these elements of the Local Plan as it evolves.

We do have some concern that the necessary background information has not been available until recently to answer a number of key questions. These include the SHENA (and SHMA) and CPRE Kent would welcome the opportunity to finalise our views on housing needs, definition of housing market area and jobs/employment land needs. We are pleased to see that the SHENA and associated documents are now available for comment. These documents are an essential part of the evidence base and need to be reviewed to make any comments on questions 4, 5, 6 and 17 meaningful.

We hope that you will give serious consideration to our representations, and we would be glad to meet and discuss with you our concerns should you find this helpful.

Please keep us informed of progress with these documents, and the further opportunities that will be available to comment.

Yours sincerely,

Jillian Barr

The Kent Branch of the Campaign to Protect Rural England exists to promote the beauty, tranquillity and diversity of rural England by encouraging the sustainable use of land and other natural resources in town and country.

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CPRE Kent

Comments on Medway Council Local Plan - Issues and Options

Developing a Vision for Medway in 2015

1. What do you think should be the key components of and ambitions for the Local Plan's vision for Medway in 2035?

The Council is faced with a significant challenge to respond to substantial development targets in a manner that enhances the urban area, improves the well-being of its residents and protects important habitats, productive land, landscapes and settlement gaps. A strong and balanced spatial vision is essential to frame the Plan objectives.

The vision should include references to:

1. Ensuring development is focused on the most sustainable locations so that the best balance is found between the use of natural resources for development and conserving the ecosystem services necessary to well-being, resilience and livelihoods;
2. Focus on regeneration through development of urban sites;
3. Working at a landscape scale to protect and enhance important wildlife habitats and locally valued / distinctive landscapes;
4. Enhancing the urban and rural biodiversity network, while also maximising the physical regeneration and community health benefits of green infrastructure.
5. Protecting the green belt and important gaps between settlements;
6. Recognising the importance of agricultural land to local sustainability and national food security;
7. Recognising the value of tranquillity as an important contributor to health and well-being;
8. Understanding the services essential to our rural communities and allowing appropriate small scale development in the rural areas where this meets local needs and supports long-term sustainability of settlements.

Strategic Issues

2) What do you think are the strategic issues that the Local Plan needs to address?

3) How should the council respond to these issues?

Medway is a densely developed area, and there are clear and significant challenges for meeting development needs in a way that benefits its existing communities and protects what is important about its rural environments. It is notable that the remaining countryside around the Medway urban area (easily accessible to the residents of Medway's urban population) is becoming increasingly scarce. For this reason it is essential to maximise employment, housing, retail and leisure development in urban centres, so that new housing is provided alongside an increasingly prosperous urban economy. Actively prioritising urban regeneration and an attractive urban environment is necessary to ensure that development in the Medway area is sustainable and maximises the benefits to local people.

The Medway Council area benefits from internationally important wildlife sites. As recognised in the consultation document, there is a Strategic Access Mitigation and Management Strategy which (provided mitigation is secured) should ensure growth does not have a significant effect on the North Kent Marshes SPA's and Ramsar sites. It is notable, however, that there have been marked declines in some bird species around the Medway. While it is understood that the SAMMS is not very sensitive to housing numbers, it is important to recognise that the cumulative increase in housing requirements (since the SAMMS was first envisaged) across the whole North Kent Environmental Planning Group area has been substantial. It is the view of CPRE Kent that the North Kent Environmental Planning Group, informed by professional ecological advice, monitoring data and Natural England should collectively confirm that the SAMMS remains a robust strategy to mitigate the impact.

Landscape, and in particular those landscapes designated for their 'wider than local' importance, are strategically important issues for the plan to address. A landscape scale approach to conservation and planning is important to achieve environmental objectives at a landscape scale. Landscape issues, should include consideration of tranquillity and dark skies.

The current local plan also includes Green Belt designation and Strategic Gap. By their very nature these are strategic issues that must be addressed in the Local Plan.

Finally, 'best and most versatile' agricultural land is an issue of strategic importance. At this early stage in the plan-making process it is recommended that a research study on BMV agricultural land is carried out to inform plan-makers and other stakeholders in the Medway Council area about the economic value of the best and most versatile (BMV) land. Swale Borough Council completed a similar piece of work and this has assisted in their decision-making.

Housing

4) Do you agree with the approach and conclusions of the assessment of housing needs calculated for Medway over the plan period?

In the absence of a final published SHMA, CPRE has not commented in detail on the housing needs calculations, the extent of the housing market area, nor the appropriate level of affordable housing. CPRE would welcome the opportunity to comment on this question when these key pieces of evidence are finalised and become available for scrutiny. In general terms, CPRE notes the ambitious forecasts for employment growth and would argue that the potential for reduced out-commuting, increased economic activity and reduced unemployment, needs to be taken into account. CPRE would be concerned if employment forecasts were having an upward pressure on the housing requirement beyond the demographic projection.

It is not clear in the Issues and Options document whether any household growth scenarios or development strategy options have been subject to Sustainability Appraisal. This should inform the development of the Local Plan and demonstrates the consideration of reasonable alternatives - a specific requirement of SEA legislation.

CPRE queries whether there has been a consultation on the SA Scoping Report?

Clearly environmental constraints are significant in the Medway area and consideration of the proposed SHLAA sites, together with the cumulative impacts of development may result in a conclusion that resultant housing targets need to be constrained. In paragraph 7.10, the Council recognises that the NPPF requires local authorities to meet housing need, but only so far as it is consistent with other policies in the

framework. It should not be used as a proxy for a target, which can only be determined following a proper consideration of environmental and infrastructure constraints, including consideration of the cumulative impact of development.

5) What do you consider to be the appropriate housing market area for Medway?

In the absence of a published SHENA (and SHMA), CPRE has not been able to comment on the Housing Needs calculations, the extent of the housing market area, nor the appropriate level of affordable housing. CPRE would welcome the opportunity to comment on this question when these key pieces of evidence are finalised and become available.

6) Do you agree that 25% is an appropriate level for the requirement of affordable housing, and what threshold should be set for the scale of development that needs to provide affordable housing?

In terms of affordable housing thresholds, and in the absence of further viability information, CPRE encourages the provision of affordable housing on sites of 5 homes and above. This low threshold is particularly important in rural areas. It would be appropriate, however, to finalise an affordable housing threshold on the completion of a viability assessment and this is somewhat difficult to do accurately at such an early stage in the process. It might be that a variable threshold will be appropriate depending on location.

Economy

17) Do you agree with scale of jobs and employment land needs identified for Medway over the plan period?

In the absence of a final published SHENA, CPRE has not been able to comment on the jobs and employment land needs identified. There does not appear to be sufficient information for stakeholders to make informed comments at this stage. In the absence of further information, it appears that a jobs growth of 17,200 (21%) seems very ambitious when considering past trends and the need to take proper account of uncertainties associated with major strategic sites and competition expected from neighbouring local authority areas.

While it is of course agreed that the position of Medway within the Thames Gateway offers excellent opportunities for regeneration and investment, it has not yet had the benefits that were anticipated. Unemployment remains above Kent average in Medway, and growth has not been in those industries that provide potential for sustained value added growth. A strong strategy for attracting high value employment growth is required. The potential for reduced out-commuting, increased economic activity and reduced unemployment, needs to be taken into account and CPRE would be concerned if employment forecasts were having an upward pressure on the housing requirement.

20) Is it feasible to reduce the amount of out-commuting from Medway, and what would be required to achieve this?

In order to reduce out commuting from the Medway area, a strategy is needed to encourage higher skilled, higher paid employment in the area. Due to the proximity of London, however, there is likely to be a wage gap that would be difficult to resolve and a strong strategy for attracting high value employment growth is required. Protection and enhancement of the Medway environment will be key to attracting high value employers.

21) How should the plan address the specific locational requirements of some businesses, for example access to wharves?

The plan should seek to safeguard (using Article 4 Directions where appropriate) employment land closely related to wharves, and protect the wharves themselves. Wharves are a diminishing and finite resource and (even if currently underused) may be essential for sustainable transport in the future.

Retail, Commercial, Leisure and Town Centres

25) Should we focus investment & retail capacity on Chatham to consolidate its position as Medway's highest order centre?

26) Should we seek to facilitate development in Chatham of sufficient critical mass to improve market share, or plan for investment to meet currently identified capacity only?

Increasing town centre populations, subject to good design and infrastructure provision, should help the vitality and viability of retail centres and local transport hubs. Improving retail market share of Chatham town centre, however, will not simply be achieved by increasing levels of housing. Long term retail trends are very difficult to predict and there is a risk that existing shopping patterns might simply be compounded.

High density urban development in appropriate locations might encourage leisure uses – including food and drink uses that can improve the vitality of the town centre, including the 5-9 economy (increasingly critical to a successful town centre) and night-time economy. Environmental/ public realm enhancements will also assist to encourage local people to use town centres and there may be potential to partly fund these through CIL.

Environment

30) What are the most effective means to secure and strengthen Medway's environment, in the context of the area's development needs?

The substantial wildlife and landscape constraints in the Medway area will mean that development pressure is likely to be focused on land that, despite not having national and international protection, may nevertheless have locally important designations and/or have a significant local value. Urban edge landscapes, for example, can have a special value, cultural relevance and accessibility to local people and it is important that this is not ignored as part of plan-making. It is suggested that a landscape capacity study should be carried out across the area to consider landscape character sensitivity and visual sensitivity of land under development pressure. At the site assessment stage this can be developed further to consider 'value' in more detail in terms of remoteness, tranquillity, cultural association, conservation interests and landscape designations. This landscape focused work assists assessment of the capacity of landscapes to accommodate change.

It is also important, at this stage in the planning process, that local communities are encouraged to identify Local Green Spaces particularly important to them. As stated in the NPPF, this should *'be consistent with the local planning of sustainable development and complement investment in sufficient homes, jobs, and other essential services'*.

31) What opportunities should be pursued in the Local Plan to extend connectivity for wildlife and people throughout urban and rural parts of Medway?

Green Infrastructure and connectivity for wildlife and people should be an important theme of the Local Plan. Existing and potential green infrastructure should be identified at early stages of plan preparation so that opportunities can be identified and delivered. Key green infrastructure features, such as the Medway Valley, and their contribution to connectivity (leisure, landscape and biodiversity) should be protected and enhanced.

32) What approach should be taken to determining the role of landscape in producing a spatial strategy for the new Local Plan, and development management policies?

For the most part, existing Areas of Local Landscape Importance and Special Landscape Areas (renamed) should continue to be locally designated in the new plan since their importance and function are accepted. Securing key pieces of valued landscape, green gaps or specific green infrastructure features by designation is an important means by which the Local Plan can protect the environment. The Strategic Gap, as currently designated in the adopted plan, for example, defines and separates existing communities and prevents settlements from merging. This contributes to social and environmental elements of sustainability, by supporting strong and vibrant communities and maintaining a high quality rural environment. Please refer to a recent appeal at Bodkin Farm, Chestfield (APP/J2210/A/14/2227624) where the inspector considered that green gap policies were *'consistent with the NPPF's principle of the different roles and character of different areas (paragraph 17), and its advice that Local Plans should identify land where development would be inappropriate (paragraph 157)'*.

Built Environment

33) What approach should we take to managing Medway's heritage assets, particularly in the context of bringing forward regeneration?

Successful regeneration must have a lasting effect on places and communities that live in them. By creating a sense of place that reuses and restores heritage assets you can add value to a development and reduce social exclusion. Heritage assets bring a sense of place to an area, and the associated character and distinctiveness can provide a framework for regeneration plans. Local communities are proud of their heritage and by using heritage assets in regeneration schemes, local pride and self-image can be strengthened. The bid to have the Chatham dockyards designated a UNESCO World Heritage Site should be used as a catalyst for Medway's regeneration. By filling Medway's empty homes and securing development that sympathises with Medway's rich heritage, communities can get involved to help conserve them.

37) What requirements should be sought of new developments in Medway to give them a distinct character and ensure they function well, in both central areas (including brownfield sites) and suburban areas?

Each development should be unique and sympathetic to its surroundings. They should be low carbon with solar panels on roofs to contribute to energy production. Brownfield sites should be a focus for development and regeneration; and to preserve green spaces as much as possible. Smaller developments and self-builds should be encouraged to support delivery of local plan targets and diversity of character for the areas that are being developed. New developments should have good links to nearby urban centres (preferably walking distance to limit traffic), green spaces and community facilities.

Rural Issues

38) How should the role of Hoo St Werburgh as a service centre be developed?

It is essential that an audit of existing services is completed. This can assist the Council to determine a settlement hierarchy which would indicate, according to broad sustainability criteria, whether smaller settlements can make a contribution to meeting development needs. It is understood an infrastructure audit has been carried out, but without access to this information it is difficult for CPRE to comment on the role of Hoo, both as it relates to a hierarchy of settlements and in terms of complete range of services available to its residents.

In general terms, in rural settlements, CPRE Kent supports the provision of affordable housing, or other housing to meet local needs on appropriate sites, where that is broadly supported by the local community. The case has not yet been made to demonstrate that Hoo St Werburgh, nor any other rural settlement could make a significant contribution to wider development needs.

40) How should the Local Plan address the need to maintain and improve access to services in rural areas?

Understanding the services available to our rural communities is essential. There may be value, subject to consultation with local people, in allowing appropriate small scale development in the rural areas where this meets local needs and supports long-term sustainability of settlements.

Maintaining and, where possible, improving access to services and employment can broadly be supported in terms of creating sustainable communities. In order to deliver these, previously developed land in sustainable locations should be reused as far as possible so that the benefits to community life are maximised. It is clearly important to discuss the future of villages with the Parish Council and local people.

Open Space

49) Is it an appropriate ambition to preserve the integrity of the open space estate, or should we be seeking to rationalise the estate?

50) Should we continue to set a local space standard and seek to address shortfalls by new provision, and if so is the current level of 3.25ha per 1,000 population appropriate?

The open space resource available to the people of Medway contributes to physical and mental health, wildlife, tourism and numerous other ecological services. It is necessary at this stage in the process to update the open spaces strategy, so that the plan-making process can properly understand quantity, quality and accessibility of spaces to the existing and future population before setting appropriate open space standards. In the absence of this it is not appropriate to consider rationalising the estate, particularly in view of an already constrained local standard. Open space is made up of numerous open spaces types, and communities may be deficient in certain types of open spaces even if the total resource appears to be in surplus.

Natural Resources

56) What weight should be given to the protection of the best and most versatile agricultural land, in the context of considering sustainable locations to accommodate growth in Medway?

Protection of Best and Most Versatile Agricultural land is an issue of national, as well as local importance. Land at the urban edge often measures well against sustainability measures associated with proximity to employment and services, but in the Medway area is often high quality agricultural land. This conflict, together with a limited availability of lower quality land means that Medway should redouble its efforts to identify as many sites as possible within the urban area, supported by a proactive enabling team. At this early stage in the plan-making process it is recommended two additional studies are completed:

- (1) A research study on BMV agricultural land to inform plan-makers and other stakeholders in the Medway Council area about the economic value of the best and most versatile (BMV) land. Swale Borough Council completed a similar piece of work, and this has been helpful information.
- (2) A new urban capacity study should be used to proactively identify urban brownfield sites. The importance of agricultural land and its relevance to sustainable development can be best protected in constrained locations like this by proactive approach to identifying urban brownfield sites. Even small sites, when properly promoted by an LA, can make a significant contribution to 5 year supply, and help avoid the over reliance on large greenfield sites.

Air Quality

57) How should the Local Plan address the AQMAs and the potential development sites that could be affected by pollutants in these areas?

It is important to ensure that new development does not make local air quality any worse. Indeed improvements should be sought through Local Plan sustainable transport commitments. The Local Plan and a Sustainable Transport Strategy need to make sure they properly fulfil the key role they need to play in delivering a shift to non-car modes of development.

Minerals

59) What are the requirements for wharves and their supporting land-side infrastructure in Medway over the plan period?

It is important for the Medway area, and more broadly in South East region, that wharves and supply-side infrastructure are protected. These will be especially important in contributing to the routes available for importing construction materials and long term sustainability of transport.

Sustainability and climate change

61) What should sustainable development look like for Medway? What plans and policies should we put into place to achieve this?

Sustainability appraisal is an essential means by which we can ensure that the process of development plan preparation takes account of sustainability. Generation of sustainability objectives and the key questions against which the plan is tested should be subject to consultation. If the Medway Council Sustainability Appraisal Scoping Report is pre-NPPF, then a review is essential. The issues and 'plans and programmes' context has changed substantially.

Social sustainability is a significant issue for the Medway area. Although the text of the document mentions limited access to green spaces at some urban areas, it fails to recognise this as substantial issue. The health and well-being disadvantages associated with a lack of access to open space / countryside is notable. While, of course, each site needs to be considered for the contribution it might make to meeting development needs, there is a strategic issue of key importance for the Medway area associated with the access of its existing population to countryside and open spaces - and the associated ecological services. From this perspective it is essential that the commissioned Green Infrastructure Planning Project is completed before future strategies for growth can be progressed.

Green infrastructure can be multifunctional and can increase access to recreational opportunities, benefit wildlife, store water, provide opportunities for food production, and provide access to relaxing spaces. Spaces should be linked into a network and care should be taken not to increase recreation on the most sensitive wildlife habitats.

63) What measures should new development take to mitigate and adapt to the risks posed by climate change?

CPRE disagrees with the concept that *'because of the relative uncertainty about potential impacts and solutions, it may be appropriate to focus on measures which are easy and lower cost to implement, or which bring additional benefits'*. It is no longer appropriate for climate change mitigation and adaptation to be an 'add-on' in local plans. Local Plans should be a key tool by which we ensure that future communities are resilient to the impacts climate change (some of which are inevitable) and minimise the contribution of our activities to future climate change.

The local plan should encourage a range of measures, including: encouraging renewable energy production on buildings; ensuring development is in sustainable locations; ensuring accessibility of sustainable transport modes; enhancing green infrastructure networks; securing sustainable urban drainage, and ensuring building design and layout incorporates resilience to climate change.

The Council should not be distracted by the outcomes of the housing standards review. Good design and the improved resilience to climate change that this can give our new communities remains a tool that local policy preparation should use proactively.

Tackling climate change, including mitigation and adaptation should be incorporated in the sustainability appraisal framework. This can ensure the concept is integral to plan making.

65) Should Medway adopt the optional national standards for water efficiency? What local evidence would we need to underpin this?

The South East is classified as an "area of serious water stress" by the Environment Agency, and is likely to be the most susceptible to the effects of climate change. Maximum standards for water efficiency should certainly be sought. CPRE is concerned that the Water Resources Management Plan and its forecasts do not take into account the total (and updated potential housing requirements) extent of population increases in Medway and more generally in the south east.

65) How should flood risk and SuDS be taking into account in planning for growth in Medway?

Paragraph 23.3 is not an NPPF quote and in fact poorly represents a statement in the Planning Practice Guidance. SuDS do not make development appropriate in areas at risk of flooding. Inappropriate development should be directed away from areas at highest risk of flooding and the 'Technical Guidance to National Planning Practice Framework' gives further advice on implementation of the NPPF.

Making Space for water is a critical planning issue and there is clear national guidance on a sequential approach to the delivery of development. It is of course agreed that SuDS should be considered in all major development, where appropriate. The benefits can be substantial to reduce the impacts and causes of flooding. They should be incorporated into the green infrastructure elements of development design and combine water management with recreation and biodiversity network benefits where possible.

Energy

68) Should we allocate sites or zones for wind energy development?

69) What policies should we set for other forms of energy development?

While wind and solar energy production can make an important contribution to tackling climate change, CPRE believes this should not come at the expense of the beauty, character and tranquillity of the peninsula. Proposals should be assessed for their potential impact on the landscape, taking account of their cumulative impact, and strongly resisted if the impact is unacceptable or not supported by local communities. Opportunities should be sought for solar energy production on existing buildings.

Transport

71) What infrastructure is required to support Medway's growth over the plan period?

72) What measures should be considered to increase public transport usage and rates of walking and cycling in Medway?

CPRE agrees with the list for consideration in paragraph 25.6 of the consultation document. The Local Plan does however, need to prioritise the following when identifying sites and infrastructure requirements:

- (1) Reduce overall need and demand for travel;
- (2) Promote a shift to sustainable modes - especially walking, cycling and public transport - with more innovative approaches and better design of systems;
- (3) Increase capacity only if the first two priorities have been fully implemented and environmental limits would not be exceeded.

74) What are the requirements for waterside infrastructure, such as docks, wharves, marinas, piers and berths, and their supporting landside facilities, to support commercial and leisure activities?

The plan should seek to safeguard (using Article 4 Directions where appropriate) employment land closely related to wharves, and protect the wharves themselves. Wharves are a diminishing and finite resource and (even if currently underused) may be essential for sustainable transport in the future.

Deliverability

76) How can the Council ensure that the Local Plan and its policies remain deliverable while seeking to ensure that development in the area is high quality and sustainable?

In more general terms, CPRE is concerned that the identified housing need is unlikely to be deliverable. The suggested level of housing need has not been delivered in the last 25 years, even in the years of high density flat development prevalent at the end of the last decade. Undeliverable development requirements result

in a failure to meet 5 year supply quickly after adoption, leaving local communities at risk from speculative development proposals.

It is essential that local plan housing allocations deliver housing at the time and rate expected. An unrealistic development phasing of allocations inevitably results in local planning authorities failing to meet their 5 year supply, resulting in speculative development being given permission. CPRE Kent appreciates the issues raised at paragraph 26.7 in terms of the benefits of large sites in the delivery of significant infrastructure. However, small sites are incredibly important in the preparation of a deliverable plan. They can be delivered quickly and will make a significant contribution to meeting 5 year supply in the early years of the plan.

77) Should we consider setting different rates of affordable housing and CIL contributions to take account of differing viability between areas of Medway?

In the absence of a published SHENA or SHMA, CPRE has not been able to comment on the Housing Needs calculations, the extent of the housing market area, nor the appropriate level of affordable housing. CPRE would welcome the opportunity to comment on this question when these key pieces of evidence are finalised and become available.

Development Strategy

80) Are the development principles right? Should other guiding principles be introduced?

Development principles should include the following:

- **Minimising energy needs** through the appropriate design and location of development, and through building mounted renewable energy technology and sustainable construction methods.
- **Protecting and enhancing the natural, historic and built environments**, including Medway's network of green infrastructure which is essential to support the health and wellbeing of communities.
- Ensuring full local **community involvement** in planning for significant new proposals.

81) Do you agree with the assessment of advantages and disadvantages of the various development type options set out above? Are there other advantages and disadvantages that should be considered?

The advantages and disadvantages of different development options are a useful commentary for the range of potential development patterns. It is important, however, that these options are subject to a high level sustainability appraisal, with the advantages and disadvantages approached in a more structured manner according to sustainability objectives. This is a specific requirement of the SEA Legislation and receives considerable scrutiny.

82) Which development type (or combination of types) do you think best meets the identified growth requirements for Medway?

The growth requirements suggested in this options document have not been subject to scrutiny due to background documents not being available – including SHMA and Sustainability Appraisal.

Any future decision at Lodge Hill will have substantial implications for the combination of development types that is appropriate. Certainly urban brownfield sites will be key to providing housing in sustainable locations that can contribute to regeneration aspirations and CPRE has suggested previously in this questionnaire that detailed study of urban capacity is essential. Beyond that, detailed assessment, consultation and Sustainability Appraisal will need to determine the most appropriate strategy for meeting remaining development needs. Clearly there are difficult issues to balance. Development associated with the loss of agricultural land on the Hoo Peninsula will have implications for the sustainability of new development and might be particularly harmful to internationally important wildlife habitats. The loss of less extensive areas of agricultural land at urban edge locations would be detrimental to urban edge landscapes and the ecological services essential to the health and quality of life of urban communities. Sustainability Appraisal and consultation are key, but sequential approach will clearly be fundamental to the preparation of a sustainable Medway plan and these decisions cannot be made until urban capacity is considered in detail and the future of Lodge Hill is known.

83) Should we consider more radical approaches to meeting development needs, such as significant increases in density, or large-scale redevelopment of existing employment areas for residential or mixed use?

Medway does provide opportunities for high density urban riverside development. Not only is high density development appropriate in Medway, the sensitive nature of the rural area (and its relationship to the Thames Marshes / North Kent Marshes SPA) and the scarceness of accessible countryside at the urban edge means that every effort should be made to maximise the contribution of previously developed urban sites to meeting development requirements.

Although retention of urban employment sites is important to sustainability of the settlement, it might be appropriate in some cases to enhance the urban environment through mixed use redevelopment to include flexible employment space. Such developments can have short term barriers to viability and difficulties with land assembly. For this reason it may not be appropriate to rely on them in the early period of the plan.

84) Should the green belt boundary be reviewed?

The Green Belt boundary should only be altered in exceptional circumstances. Much of the urban area is delimited by the M2 and is not available for urban extension. The rest is subject to a range of other national designations, including AONB. It is unlikely that a boundary review would be successful in identifying sites.