

From: Ivan Kingsley Smith [mailto:ivan@ks-surveyors.co.uk]
Sent: 25 May 2012 15:47
To: ldfprogrammeofficer
Cc: Nicholas Kingsley-Smith
Subject: Medway Core Strategy

For the attention of the Medway Core Strategy Program Officer

Dear Madam

Please find attached the following submissions:

- 1 Bakersfield, Station Road, Rainham (housing) together with an attachment letter from House Builders Federation dated 24th May 2012
- 2 Rochester Bridgewood, Maidstone Road, Rochester (employment)
- 3 Mill Hill, Gillingham to be read in conjunction with the representation being filed to you directly by John Collins of DHA Planning (Gillingham Football Club)

As advised by you to Nicholas Kingsley Smith, it is acceptable to post three paper copies of each and this is hand.

Kindly acknowledge safe receipt.

Regards

Ivan Kingsley Smith, MRICS

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Promotion of land at Bridgewood, Rochester

Further submissions for Examination in Public of the Medway Core Strategy

1. This site has already been the subject of representations which should be read with these further submissions.
2. As previously noted, land at Kingsnorth and Grain is not suitable for SMEs, which are critical to the future economic growth of the Council's area and to the retention of jobs in the area. As table 6.2 graphically demonstrates, there is gross under-provision of employment land in all areas apart from the Peninsula, including an under-provision of 134,242 sq m in the "M2 Access" area. This shortfall cannot go unaddressed. The Council's economic strategy would drive all new employment opportunity to the Peninsula: an area which, in terms of commuting, is difficult to reach from the Medway Towns. The Peninsula is not a sustainable location in which to meet the district's employment needs and therefore proper consideration is required to meeting those needs in other areas around the Medway Towns. The Council's own Economic Development Strategy recognises that land available on the Peninsula should be excluded from forecasts because it is remote and unattractive to employers.
3. In those circumstances, opportunities around the M2 are of particular importance, because they locate employment opportunities in readily accessible areas which are nevertheless close to the main housing areas. Policy CS17 expressly recognises the role of Rochester Airport as a hub for SMEs. The Bridgewood site lies adjacent to both the airport and the M2, and therefore is a site with significant potential to contribute towards economic development.
4. This site lies close to the boundary with Tonbridge and Malling. The Tonbridge and Malling Core Strategy excludes land to the east of the M2 north of Walderslade from the Strategic Gap and identifies the parcel of land in the north of the district to the east of the M2 as a safeguarded employment site (see Tonbridge and Malling CS policy CP21 and Key Diagram). There is

no sensible reason for a different approach to be taken to the land which lies immediately to the north of that land in Medway's area, which includes Bridgewood.

5. In the CS itself, the site lies within the M2 Access sub area (figure 6.1). However its potential is not addressed in the Rochester commentary, which seems to completely ignore this important area between the M2 and the airport. The general area is simply identified as a "strategic employment area" on the context diagram (fig 10.4), although that diagram appears to not align with figure 6.1 in terms of the areas shown as falling within the M2 Access.
6. The site has previously been considered for development but excluded in a "finely balanced" decision. Site specific consideration has found that the site's development would have limited impact on the landscape to the west of the M2. The reason for refusing permission was a "raft of protective development plan policies". Once the CS is adopted, those protective policies will no longer apply. Accordingly the CS should recognise the potential of this site, as part of the Rochester Airport and M2 Access employment opportunities, to contribute towards economic growth in the Council's area and redress the stark imbalance between the employment land provision in the Peninsula and that in the rest of the Council's area.
7. The independently prepared Economic Strategy report (EB52) on page 3 identifies Medway as having a dearth of good quality employment sites. On page 4 of the report it states that appraisal should be undertaken of sites at and neighbouring Rochester Airport for employment space. This has not been undertaken by the Council. Policy S11 of The Adopted 2003 Local Plan allocated Rochester Airport for high quality business, science and technology development to be guided by a development brief. In the following 9 years, not even a draft development brief has been published by the council, and with the exception of the central government funded Innovation Centre, no development at Rochester Airport has taken place, or even proposed.
8. The Economic Strategy at 8.29 advises from the 2001 census, 48,300 people out commute from Medway with 19,200 in commuting. Even excluding the

36% (17,400) of people who commute to London as somewhat an inevitability being close to the Capital, 11,700 more people out commute from Medway for employment (and excluding London) than in commute. This is unsustainable and caused by the dearth of employment opportunities in Medway. As 8.32 advises, there needs to be a rebalancing between housing and employment land. "The issue of employment land is intrinsically linked to economic development, regeneration and the realisation of local strategic priorities in Medway" (8.31). The independent Baker Associates report - The Employment Land Review Consolidation Study 2010 (EB24) at point 4.2.42 identifies an imbalance of 34,332 residents compared to job opportunities.

9. Within executive summary of The Employment Land and Accommodation Study 2007 (EB53), point 8 says "However, the potential shortage of suitable employment land particularly within the urban core is noted in the Economic Statement 2006 as serious block on job creation". The report's employment land provision conclusion is at 5.5.15 and 5.5.16.
10. The independent Baxter Associates report – Employment Land Review Consolidation Study 2010 (EB24) – at 5.2.20, Table 5.9a identifies a M2 Access employment land shortfall of 8.29 hectares even assuming delivery of 1.87 hectares at Temple Waterfront, 6.4 hectares at Rochester Airfield and 7.22 hectares at Lodgehill (the former two sites are existing employment sites). The State of Medway Report Economy and Employment updated January 2012 (EB113) at point 12.6 re-affirms the 8.29 hectare shortfall.
11. The Economic Strategy at 8.30 advises Medway needs to identify employment land for 25,000 people in the plan period. 8.34 of the Strategy places store upon Chattenden/Lodge Hill to contribute to the employment needs. LH07 advises Lodgehill could deliver 4,720 jobs in the CS plan period though there must be caution upon these predictions as Lodgehill is an untested and undeveloped site, without a planning permission and infrastructure

12. Medway Council have been repeatedly informed by independent experts of the shortfall of employment land in the needed/core locations. However, this issue has not been addressed.

13. Medway has lost a very large acreage of employment land in the heart of Medway with good access to main roads and local labour force to satisfy the housing shortfalls. Having pursued this policy over a long period of time, there are now very few sites, green or brown, that offer the sustainable mix of proximity to the local labour force and good transport connections (the mass of Medway's labour force is south of the River Medway). It is proposed that Policy CS17: Economic Development be amended as follows: delete the words "the continuing opportunities at, and in close proximity to, Rochester Airfield to develop a technology and knowledge based cluster" and to substitute "urgently to develop a series of discrete sites within the M2 Access sub-area (shown in Figure 6.1) for B1,B2 and B8 uses suitable for SMEs".