

## **FURTHER REPRESENTATIONS BY HELVIG ON MEDWAY LOCAL DEVELOPMENT FRAMEWORK PUBLICATION DRAFT CORE STRATEGY:**

### **1) Introduction:**

1.1 These further representations are submitted by Helvig to supplement those submitted on the 13<sup>th</sup> October, 2011. The representations are concerned with changes made to the Core Strategy between it being approved by Medway Council's Cabinet in December 2011 (Cabinet version) and its submission for examination in February 2012 (Submission version). The further representations address the soundness of the Submission Draft Core Strategy with respect to employment floorspace supply.

### **2) The Changes:**

2.1 The changes made between the Cabinet and submission versions of the Core Strategy are understood to largely, if not entirely, relate to updating as a result of the Council completing in January 2012 a review of the Medway Strategic Land Availability Assessment (SLAA).

2.2 In Table 6-2 of both the Cabinet version and Submission version of the Core Strategy, employment floorspace requirements and supply are set out by sub-areas or zones and the figures are identical between the two versions. However, in the SLAA, Table 2, the following potential employment sites and floorspace in the M2 Access zone are identified as being capable of coming forward between 2010 and 2028:

Site 0050 Lodge Hill 44,100 sq m

" 0137 Civic Centre Strood 2000 sq m

" 0564 South Thames Regional Health Authority Land, Gillingham 12,168 sq m

" 0685 Temple Waterfront, Strood 10,300 sq m

" 0686 Roman Way, Strood 4,440 sq m

" 0724 BAE Systems, Rochester Airfield 11,147 sq m

" 0804 Former Officer's Mess, Maidstone Road, Chatham 4300 sq m

" 0845 Woolmans Wood Caravan Site, Chatham 6160 sq m

These 8 sites have potential to supply some 94,600 sq m of employment floorspace up to the end of the Core Strategy period in 2028.

2.3 This figure for potential employment floorspace supply in the M2 Access zone appears to be significantly at odds with the 49,505 sq m of

potential floorspace supply in that zone in Table 6-2. Actual supply of employment floorspace in the M2 Access zone therefore would appear to be 191% higher than identified in the Submission version. This raises the question what evidence base is being relied upon for Table 6-2 and how that relates to the SLAA which paragraph 6.19 of the Submission version indicates is part of the evidence base.

2.4 Another difference between Table 6-2 of the Submission version and the SLAA relates to those sites in the Peninsula zone. Table 6-2 states the floorspace supply in the Peninsula zone as 666,290 sq m. Table 2 of the SLAA would indicate that these Peninsula zone sites have the potential to supply 715,742 sq m of floorspace up to 2028. There would, consequently, appear to be a significantly greater amount of potential employment floorspace in this zone than the Submission version is acknowledging (that is an additional of 49,452 sq m).

2.5 There are also significant discrepancies within the submission version, and between it and the SLAA, over potential floorspace supply. Policy CS17 of the submission version refers to a supply of around 935,998 sq m of employment floorspace. However, Table 6-2 of the Submission version refers to total floorspace supply as 796,998 sq m. The difference between these two figures for total employment floorspace supply is considerable at 139,000 sq m. Table 2 of the SLAA totals to a completely different potential employment floorspace supply of 881,737 sq m.

2.5 Other changes with respect to potential floorspace supply are apparent between the Cabinet version and the Submission version which are not explained. In Table 10-2 of the Submission version, the former Civic Centre site in Strood was identified as a Potential Employment Development for 18,060 sq m. In the Submission version this employment potential has shrunk to 2,000 sq m. Again, the evidence base for this very significant reduction in employment floorspace potential on what must formerly have been the largest single employment site in Strood is not available.

### **3) Conclusions:**

3.1 This analysis of the tables for employment floorspace supply introduces uncertainty about what constitutes the evidence base for the Submission version of the Core Strategy and how that has been interpreted. There are such significant differences between the various figures for employment floorspace supply quoted above that any proper interpretation of them becomes very difficult. It is fundamental to the soundness of the Core Strategy that the evidence base be clear and readily understood. The above analysis of some of the differences in the employment floorspace supply between various versions of the Core Strategy and its evidence base, the SLAA, throws into considerable doubt the soundness of that document.