

CONSULTATION STATEMENT

Innovation Park Medway

Local Development Order and Design Code

SUBMITTED BY MEDWAY COUNCIL AND TONBRIDGE & MALLING BOROUGH COUNCIL

DECEMBER 2020

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1 INTRODUCTION

- 1.1 This Consultation Statement (the ‘Statement’) has been prepared by Carter Jonas LLP (‘Carter Jonas’) in support of the Local Development Order (‘LDO’) and Design Code (‘Design Code’) at Innovation Park Medway (‘IPM’). The LDO and Design Code have been prepared on behalf of Medway Council (‘Medway’) and Tonbridge & Malling Borough Council (TMBC).
- 1.2 This Statement forms part of a suite of documents detailing the proposals for IPM and follows the initial consultation that took place between June and July 2019. Both consultations focused solely on the LDO and Design Code.

Purpose and Scope

- 1.3 This Statement sets out why and how both Councils have engaged with the local community and key stakeholders. It sets out analysis of feedback received by respondents and explores how these comments have influenced the refinement of the LDO and Design Code. In doing so, it will be made clear in this Statement what comments have been received, how the comments have been addressed and a justification provided where this has not been possible.
- 1.4 An initial stage of consultation ran for a period of 32 days between 17th June and 19th July 2019 for Medway and between 20th June and 22nd July for TMBC. Following feedback, the Councils have undertaken further assessments and produced technical information, the content of which has been incorporated as addendums to the Environmental Statement, updates to the Design Code and revisions to the LDO. This information was published for consultation between 26th October and 27th November for Medway and 29th October to 30th November for TMBC.

Structure

- 1.5 The remaining sections of this Statement are structured as follows: Section 2 confirms the engagement strategy, Section 3 discusses the engagement activities, Section 4 sets out the feedback, Section 5 examines how the feedback has informed the refinement of the LDO and Design Code and Section 6 provides the conclusions.

The LDO

- 1.6 LDOs are recognised in the National Planning Policy Framework (‘NPPF’) at paragraph 51 as a means of setting the *“planning framework for particular areas or categories of development where the impacts would be acceptable, and in particular where this would promote economic, social or environmental gains for the area”*.
- 1.7 This LDO will provide certainty to the type, use and form of development at IPM and in return, facilitate economic growth by allowing firms and businesses to react quickly to growth opportunities through a simplified planning process stimulating investment by reducing the potential and perceived risks associated

with the formal planning route. Such risks include reducing associated costs as a full technical evidence base has already been undertaken in support of the LDO.

- 1.8 This LDO will create high skilled jobs and drive innovation that will secure growth and prosperity in the region, realising the potential of this area whilst ensuring the operational longevity of Rochester Airport. This LDO will also support the both Medway's and TMBC's goals of supporting commerce and encouraging the development of high value technology, advanced manufacturing, engineering and knowledge-intensive businesses which are considered to be important target areas.

Design Code

- 1.9 The LDO is supported by a Design Code which works alongside the Masterplan (March 2019) to provide certainty as to what is considered acceptable design. The Design Code provides design guidance for all important features and will help to ensure the high standard of place making at IPM is delivered and maintained. By following the Design Code, businesses will be able to achieve quick resolution of approvals.

Figure 1 – Masterplan



2 PUBLIC CONSULTATION AND ENGAGEMENT

Legal Framework and Policy

NPPF and PPG

- 2.1 In respect of engagement, paragraphs 39-46 of the NPPF set out that all applicants are expected to work closely with those directly affected by their proposals, therefore considering the view of the community. Specifically, paragraph 39 states:

“Early engagement has significant potential to improve the efficiency and effectiveness of the planning application system for all parties. Good quality pre-application discussion enables better coordination between public and private resources and improved outcomes for the community”.

- 2.2 As dictated by Planning Practice Guidance (PPG), public consultation may be beneficial if development is expected to have a particularly significant impact. Any consultation should allow adequate time to consider representations and, if necessary, amend proposals.
- 2.3 The process governing the preparation and the implementation of LDOs is outlined in Planning Practice Guidance (‘PPG’). At paragraph 077 of the section entitled ‘When is permission required?’ it states that an ‘LDO cannot cross local authority boundaries. Two or more local planning authorities may wish to co-implement or co-consult on cross boundary LDOs, but each individual authority must adopt their own LDO’. As the site crosses the authority boundary between Medway and Tonbridge & Malling, accordingly, both Councils have worked together to jointly prepare and consult on two separate LDOs before each adopting their own version.
- 2.4 Both Councils’ Statements of Community involvement (SCIs) note the benefits of early engagement with residents. Both Councils’ SCIs also reflect the requirements to consult statutory consultees and provides guidance to the approaches and standards to be followed in carrying out consultation on planning matters.

Engagement Strategy

- 2.5 The consultation was undertaken in accordance with best practice and from the outset, Medway and TMBC committed to stakeholder and community engagement. A comprehensive strategy was designed to enable as many people as possible to have the opportunity to learn about the development and provide feedback. Feedback received has then been taken into account in the final iteration of the LDO and Design Code.
- 2.6 As development at IPM required an Environmental Impact Assessment (‘EIA’), in accordance with the EIA Regulations, the consultation ran for a period of 32 days between 26th October and 27th November 2020 for

¹ See: <https://www.gov.uk/guidance/when-is-permission-required>

Medway and between 29th October and 30th November 2020 for TMBC and sought the involvement of a wide range of consultation bodies including businesses.

2.7 A range of engagement methods were used to promote the consultation to make contact with a good cross-section of stakeholders and this is detailed in Section 3.

2.8 The objectives for the engagement strategy are set out below:

- To engage with local residents and key stakeholders to help them fully understand the refinements made to the LDO and Design Code;
- To build resident and stakeholder confidence in the development process through directing them to all the updated technical supporting information;
- To use multiple channels, including social media, to promote the consultation to ensure as many people as possible were informed;
- To provide clear messages about IPM, the reasons behind the LDO and how this will benefit the area;
- To provide opportunities for local people to review the suite of technical information and express their views;
- To analyse all public feedback, communicating back to the design team so that comments can be properly considered and so that the LDO and Design Code can respond appropriately; and
- To follow up and reach agreement with statutory consultees.

Use of Information Gathered

2.9 The information gathered, including personal contact details, have been recorded as part of the formal record of the process. However, such contact information is only held for the sole purpose of the work on the LDO and Design Code. Details have not been shared with any other service of either the Council or TMBC or used for other purposes than Planning Policy. Information will be held until an appropriate period after the LDO and Design Code are adopted.

3 ENGAGEMENT ACTIVITY

Website / E-Newsletter / Social Media

- 3.1 In October 2020, designated pages on both Medway's and TMBC's websites² were updated. This was to inform local residents and stakeholders of the updates to the technical information and documents that were to be published following submissions received during the initial consultation. These webpages provided links to the online planning register and comments were encouraged to the separate consultation events (26th October and 27th November for Medway and 29th October to 30th November for TMBC).
- 3.2 As with the initial consultation, both Medway and TMBC worked together to jointly prepare and consult on two separate LDOs before each adopting their own version.
- 3.3 To assist in notifying as many people as possible, TMBC also placed notification in their e-newsletter on 29th October which was sent to around 600 contacts. Both Councils also undertook a programme of social media messaging across Facebook and Twitter posting on a number of occasions across the 32-day period and this had a 2.74% response rate which is rated as 'very good' from those posts made by Medway. Posts were also 'liked' 10 times and 'shared' six.

Letter Drop

- 3.4 A letter drop to properties immediately adjacent and in close proximity to the site as required by the development management process for planning application notification / consultation was carried out.

Notification in Local Newspapers

- 3.5 An advert was placed in the Medway Messenger by Medway on 22nd October 2020 and the Kent Messenger by TMBC on 29th October 2020.

Statutory Consultees and Key Stakeholders

- 3.6 In accordance with Article 38, subsection 3 of the DMPO 2015, letters were sent to all statutory consultees including those listed below, seeking comments on the updated technical information and revisions to the Design Code and LDO:
- Environment Agency;
 - Historic England;
 - Natural England;
 - Highways England;
 - Kent County Council;

² Medway: www.medway.gov.uk/innovationparkmedway
TMBC: <https://www.tmbc.gov.uk/services/business/innovation-park-medway-consultation>

- Neighbouring authorities and Parish Councils;
- West Kent Clinical Commissioning Group; and
- Utility Providers.

3.7 Contact was also made with stakeholders who had provided important views in the development of the LDO and Design Code. These included:

- Kent Downs AONB;
- Royal Society for the Protection of Birds (RSPB);
- Campaign to Protect Rural England (CPRE);
- Kent Wildlife Trust;
- Civil Aviation Authority;
- North Kent Enterprise Zone;
- Kent Fire and Rescue;
- Thames Gateway Kent Partnership;
- BAE Systems; and
- Various other parties that are consulted on any other Local Plan documents.

4 FEEDBACK

- 4.1 Whilst there was significant interest during the first period of consultation, as this was focused on specific technical updates in response to addressing feedback received, there was a lower level of interest from local residents.

Website

- 4.2 The designated page for Medway³ had 338 views. Of these, 223 were unique, meaning that 115 people had viewed the webpage more than once.
- 4.3 Those who visited spent an average of 1 minute 5 seconds.
- 4.4 In respect of Medway, six residents / local businesses responded. In terms of statutory consultees / key stakeholders, 16 responded.
- 4.5 In respect of TMBC, two residents / local businesses responded with both being duplicated from those sent to Medway. Six responses were received from statutory consultees / key stakeholders (five of these were also submitted to Medway) with Sport England being the exception.

Statutory Consultees and Other Key Stakeholders

- 4.6 Below is a summary of the most common topics raised including specific commentary with full responses in Section 5.

Employment

- 4.7 Gravesham Borough Council, Maidstone Borough Council, and Frindsbury Extra Parish Council ('FEPC') all expressed support for the employment benefits and creation of jobs in the immediate area and beyond. FEPC also commented that "*work practices are changing and the Innovation Park should reflect this*".
- 4.8 North Kent Enterprise Zone / Thames Gateway Kent Partnership confirmed their support for the LDO and associated Design Code, stating that "*Innovation Park Medway is an important part of the North Kent Enterprise Zone and the site's potential to generate high quality employment opportunities and economic stimulus will benefit residents and businesses not only in Medway but across North Kent*".

Highways / Traffic

- 4.9 Kent County Council ('KCC') requested additional information regarding proposed mitigation, particularly at Bridgewood Roundabout and the Laker Road / Rochester Road junction. They remained "*concerned that the*

³ Medway: www.medway.gov.uk/innovationparkmedway or medway.gov.uk/info/200177/regeneration/738/innovation_park_medway_plans/3
TMBC: <https://www.tmbc.gov.uk/services/business/business-support-and-advice/innovation-park-medway-consultation/>

Bridgewood Roundabout mitigation includes land where ownership is not known” and that “this option and alternative options should be fully investigated in order to ascertain that a mitigation scheme is possible”.

- 4.10 KCC went on to state that *“additional mitigation is required to address the significant queues and delays along Laker Road at its junction with Rochester Road”.*
- 4.11 KCC also commented that *“the designer’s response has yet to be provided and revisions to drawings to include the safety audit comments, together with updated audits are yet to be received”.* This is in relation to Safety Audits undertaken for Bridgewood Roundabout, Lord Lees Roundabout and Taddington Roundabout.
- 4.12 More generally, KCC observed that *“mitigating measures at Bridgewood Roundabout are required prior to opening [of the IPM] implemented by the developer via a [Section 278] Agreement”* and that the IPM delivery programme *“should not have detrimental impact to the development and delivery of the A229 Blue Bell Hill Improvement Scheme”.*
- 4.13 Subsequent consultation with KCC has agreed wording of Condition RN4 regarding the implementation of mitigation at the Bridgewood Roundabout.
- 4.14 In the response from Highways England, they confirmed that required mitigations on or close to the Strategic Road Network (SRN) will be required at Junction 2, 3, and 4 of the M2.
- 4.15 Highways England also observed that preliminary mitigation designs for Junction 2 will need to be designed and agreed. Highways England went on to state, that should the Council intend to mitigate all impacts (IPM and other) via the Local Plan, *“this needs to be stated in the LDO, reflected in the Monitor & Manage approach (with a condition and trigger restricting IPM floorspace occupation to the delivery of the required mitigation), and then carried through to the Local Plan”.*
- 4.16 Subsequent consultation with Highways England has agreed the wording of Condition RN6 with respect to triggers and agreement of mitigation design for Junction 2 of the M2.
- 4.17 Finally, Highways England proposed several conditions to be included in the LDO.
- 4.18 Following a meeting on 13th November and subsequent submissions including the proposed wording of conditions and a monitor and manage strategy, it has now been agreed that all matters raised by KCC and Highways England have been addressed and they do not wish to raise an objection to the LDO.

Building Height / Design

- 4.19 In the response from the Kent Downs AONB Unit (the ‘AONB Unit’), they welcomed the proposed inclusion of a specific section within the Design Code on ‘Designing with the AONB’, as well as the inclusion of the Environmental Colour Assessment to inform future decisions on appropriate colours of materials, in response to previous comments.

- 4.20 The AONB Unit supported the inclusion of additional viewpoints and wintertime views in response to their original comments but remained of the view that the magnitude of change for a number of viewpoints is still too great. The AONB Unit went on to state that their original concerns remained and they urged *“the Council to reduce the height parameter”* in the northern part of the site which includes the proposed 6 storey building as this *“would clearly be more prominent in views from the AONB appearing as a further urbanising intrusion on this sensitive ridgeline”*.
- 4.21 Natural England stated that in consideration of the height of the buildings along the western edge, they expect the design *“to be sympathetic to the environment in which they sit”*. Natural England went on to confirm that whilst they support the principles within the Design Code they provided a number of observations. These included reference to the ‘Gateway’ and ‘Iconic’ buildings on the western edge and within the northern areas of IPM which are likely to be visible from the AONB. In particular, they suggested it is unclear how the design principles *“will apply to the Gateway and Iconic buildings, particularly as the Code states that Iconic building plots should appear different in style to the other general plots by using statement façade treatments, building layout and height should also emphasise the iconic character”*.
- 4.22 Natural England went on to *“advise that the building heights on the western side of Innovation Park Medway are kept as low as possible given the visual impacts that will result from taller buildings”*. In terms of lighting, Natural England suggested the Design Code should ensure detailed guidance is set out to avoid *“light pollution and associated impacts to the AONB”*.
- 4.23 Natural England went on to recommend, that *“design principles of avoiding and fully mitigating impacts to the AONB should be secured during the detailed design”*.
- 4.24 Following a number of meetings and detailed exchanges which resulted in further submissions to support this second consultation including winter views and a colour assessment, the revised Design Code, developed in consultation with the AONB Unit, has reduced the visual effects on the AONB to ensure buildings are integrated with their surroundings, are visually unobtrusive and make a positive contribution to the AONB.
- 4.25 In response to Natural England, all buildings along the western edge of the northern site would be 4 storeys or less, as per the agreed parameter plan and details of lighting are now included in the Design Code which will ensure no light pollution.

Noise / Air Quality

- 4.26 Medway’s Environmental Protection Officer (‘EPO’) commented that the noise and air quality assessments were *“acceptable”* and that they were *“satisfied with the stated noise and air quality conditions”*. However, they observed that the air quality assessment was based on a previous iteration of the Emissions Factor Toolkit (‘EFT’) and recommended that the *“dispersion model is rerun using the latest version of the EFT so that the predicted impacts are based upon the very latest evidence on vehicle emissions”*. In addition, *“the*

air quality damage costs should also be revised and based upon the latest EFT and Defra source sector costs”.

- 4.27 Following discussion with the EPO, it has been agreed that as the IPM predicted trip generation remains the same as in the original assessment, subsequent changes to vehicle emissions factors would not lead to a change in the predicted significance of effects set out in the Environmental Statement.
- 4.28 In respect of tranquillity, Natural England noted *“that the closure of the runway has been undertaken outside of the Local Development Order process”* and consider that *“the information provided in support of the Local Development Order suggests that the closure of the runway and the creation of Innovation Park Medway will not result in noise and tranquillity impacts to the AONB from an increase in flights across the Kent Downs”*.

Ecology and Environment

- 4.29 KCC Ecological Advice Service confirmed they are *“satisfied with the range of ecological surveys carried out but they required clarification on the proposed mitigation”*.
- 4.30 In particular, they requested further information including:
- *Plans demonstrating that the proposed on-site habitat creation will be implemented;*
 - *Plans demonstrating that the proposed species mitigation will be appropriate; and*
 - *Details of the proposed off-site mitigation.*
- 4.31 In addition, they highlighted that no specific information had *“been provided on the replacement habitat for ground nesting birds or reptiles”*.
- 4.32 Following a series of exchanges, it has been agreed that the additional information provided and updates to the submitted Ecological Management and Enhancement Plan has resolved all concerns. Specifically, there will be no significant increase in recreation within the area so ground birds will not be impacted on but should monitoring highlight that there has been a decline, this will need to be addressed. In respect of off-site biodiversity net gain, it was confirmed that the submitted information *“go over and above what is currently occurring on those sites”*.
- 4.33 The Environment Agency made no comments on the updated information but following further discussions, proposed some minor amendments to the draft conditions and informatives. These have subsequently been agreed and reflected in the updated LDO.
- 4.34 In relation to the Norths Downs Woodland Special Area of Conservation, Natural England confirmed *“that the proposal is unlikely to have a significant effect on any European site, and can therefore be screened out from any requirement for further assessment”*. A Habitats Regulation Assessment (‘HRA’) Screening Report was submitted in February 2019 confirming a HRA was not required. Following the advice provided by

Natural England, Medway and TMBC have now confirmed that a HRA will not be required for the proposed development.

- 4.35 Kent Wildlife Trust confirmed that whilst they do not object to the principle of the scheme, they asked for clarity on the baseline habitat and “justification as to why BNG cannot be delivered on site and/or why offsite BNG delivery is deemed to generate the most benefits for nature conservation”.
- 4.36 Kent Wildlife Trust also noted discrepancies between planting schedules in the EMEP and the design guides – including at Paragraph 4.45 of the EMEP, which specifies that 75% woodland planting would comprise native species in contrast to the design guide and they recommended “that the design guide be amended to reflect the prescriptions of the EMEP, focusing on the planting of native species throughout onsite planting and landscaping (including woodland, parkland and runway typologies”.
- 4.37 Kent Wildlife Trust also observed that Paragraph 2.4 of the EMEP (which identifies off-site designated sites that may be impacted by the proposals) only identifies Luton Banks LWS, and therefore advise that this should be extended to include “Bridge Woods LWS and Nashenden KTW reserve to the west”.
- 4.38 In response, all comments have been picked up within the updated EMEP with specific focus to on-site habitat creation and species-specific mitigation together with identifying off-site mitigation areas. A condition has also been agreed to secure ecological enhancement and mitigation and this is reflected in the updated LDO.

Heritage and Archaeology

- 4.39 Historic England did not wish to offer any further comments on the additional information but recommended that the advice of the Councils’ Conservation Advisor at KCC should be sought in relation to archaeology and other non-designated heritage within the site.
- 4.40 KCC Heritage provided no specific comments to the additional information but referred back to comments made to the initial consultation regarding the archaeological potential of the airfield and the draft conditions proposed relating to archaeology. These conditions have been agreed and reflected in the updated LDO.

Residents

- 4.41 Below is a summary of the most common topics raised.

Highways, Traffic and Congestion

- 4.42 Respondents were concerned that proposed transport mitigation measures would be insufficient to accommodate any increased traffic.
- 4.43 Specific comments included:

“The necessity of an imposition of a speed limit on Rochester Road”.

"I am not convinced that the changes to the M2 exit road at Chatham, the widening of the Rochester Road and the possible changes to the Bridgewood/Lord Lees/Taddington Wood roundabouts will significantly improve the flow of traffic in this area so any additional traffic in and out of the IPM will not be appreciated and will only make the situation worse".

"The huge increase in traffic that development will create".

Design, Layout, Scale and impacts on residents

4.44 Respondents raised concern regarding the proximity of development to properties off Maidstone Road and Rochester Road together with ensuring that the detail of development of Woolmans Wood (Parcel 4) did not affect the landowner's aspirations.

4.45 Specific comments included:

"Areas 3 and 4, the existing caravan park, is adjacent to residential properties and no consideration or concern has been shown to the owners of these properties which may well be blighted by this proposal".

"It is our client's intention to pursue the development of the site for a scheme which whilst sharing the general aspirations for high quality development, will also ensure a commercially viable range of uses".

Ecology

4.46 One respondent requested assurance that woodland and landscaped areas would be maintained:

4.47 Specific comments included:

"There are several woodland areas and areas of landscaping planned for the IPM and I would like assurance that these will be regularly maintained unlike the landscaping between the houses in our road (Maidstone Road) and the main road".

"I understand that the EIA has shown that dormice exist on the Woolmans Wood Caravan Park land, meaning that trees on this land may not be removed. Therefore, I respectfully request that when the land currently owned by Sheppey Industries is transferred to ownership of Medway Council/Rochester Airport that these trees are properly maintained".

4.48 Medway can confirm that this area is not planned to be transferred to the Council.

Impacts on Existing Airport

4.49 One respondent was concerned that the LDO would put the future of the airport at risk.

4.50 Specific comments included:

"I feel it is very short-sited to build over runway 16/34".

4.51 The operation of Rochester Airport will continue.

Negative Economic Impacts

4.52 One respondent was concerned that the LDO would impact on tourism:

4.53 A specific comment included:

“The loss of a valuable amenity, the caravan park, especially for tourism in the Medway towns.”

4.54 A response was also received from BAE Systems that, whilst supporting the development, maintained previous concerns regarding their own operations which includes issues of surface run-off. The specific comment stated:

“BAE Systems remains supportive of the principle of the LDO, along with the aspirations of both Medway Council and Tonbridge & Malling Borough Council to improve the performance of the local economy through long term job creation, but there are still day to day operational concerns over the impact of development immediately to the south of the current BAE Systems site”.

4.55 The Council will continue to engage with BAE Systems and supporting the LDO is a Drainage Strategy which addresses the issues of surface water runoff.

5 RESPONDING TO FEEDBACK

- 5.1 This section outlines how both Medway and TMBC together with their appointed consultancy team have listened to the views of local residents, statutory consultees and key stakeholders and have endeavoured to address concerns where practical and possible through further information or via direct liaison with the relevant party where necessary.

Highways, Traffic and Congestion	
Query	Response from appointed consultancy team
<p>1. Kent County Council Highways remain concerned that the Bridgewood Roundabout mitigation includes land where land ownership is not known.</p> <p>2. Kent County Council Highways have noted that mitigating measures at Bridgewood Roundabout are required prior to opening of the IPM and secured via a Section 278 Agreement.</p> <p>3. Kent County Council Highways also comment that additional mitigation will be required to address significant queues and delays along Laker Road at its junction with Rochester Road.</p> <p>4. Kent County Council Highways have asked for the designer's response to the Safety Audit, including revised mitigation layouts.</p> <p>5. Discussion concerning the IPM development and the KCC Major Projects scheme for the A229 Blue Bell Hill Improvement Scheme should continue, with a view to agreeing appropriate contributions should the programming be such that the scheme would supersede the IPM mitigating measures</p>	<p>1. Land ownership information was provided to Kent County Council Highways and Highways England on 13th November 2020 following a teleconference between KCC, HE, Medway and the consultancy team. This information showed that the land required for the updated proposed improvements to the Bridgewood Roundabout (northbound onto Rochester Road) lie partly within land owned by KCC and partly within land shown to be owned by the SoS for Transport (although Highways England subsequently suggested that the SoS's land may have previously been sold / transferred to Kent County Council).</p> <p>2. The approach to implementation of mitigating measures at the Bridgewood Roundabout has been confirmed with KCC Highways through the agreed wording of Condition RN4.</p> <p>3. The potential for additional mitigation at the Laker Road / Rochester Road junction was discussed with KCC Highways during the teleconference on 13th November 2020. Medway will propose suitable mitigation and deal with design and delivery through the Monitor and Manage Mitigation Strategy.</p>

<p>proposed. The programme of the IPM should not have any detrimental impact to the development and delivery of the A229 Blue Bell Hill Improvement Scheme.</p> <p>6. Residents are concerned that the transport mitigation measures are insufficient to accommodate any increased traffic, and that there is necessity to impose a speed limit along Rochester Road.</p>	<p>4. The proposed updated design response to the Road Safety Audit comments was tabled at the teleconference on 13th November 2020 for discussion with Highways England and KCC Highways. Highways England suggested that the updated mitigation design should be provided to the Safety Audit Team such that this could be reviewed and the decision log could be updated. This information, including the proposed updated design, a summary of other options considered, and the Designer's Response document was issued to the Safety Audit Team on 13th November 2020. The RSA Audit Team has confirmed that the proposed updated design would provide an appropriate solution subject to further detailed design prior to the next stage of Road Safety Audit. The Designer's Response has been updated accordingly.</p> <p>5. Discussions between Kent County Council Highways, Medway and TMBC on the A229 Blue Bell Hill Improvement Scheme will continue.</p> <p>6. The full extent of traffic generation from the Proposed Development has been assessed cumulatively with projected traffic associated with future development in the Medway Local Plan and traffic associated with growth in the local plans of adjacent authority areas. The cumulative effect of traffic generation has been modelled as part of the Medway Council Strategic Transport Assessment and has been undertaken in close consultation with Kent County Council Highways and Highways England. The mitigation measures identified at key junctions have been based on the outputs from the modelling exercise and these designs have been taken into account within iterations of the model to demonstrate the required level of improvement for the local highway network.</p>
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	<p>In terms of a speed limit, changes to an existing speed limit on roads would normally be associated with a material change in the driver environment (e.g. a major new development on the edge of an urban area, a new junction form or where development would lead to a significant change in the amount of pedestrians and cyclists on a given link), a significant change in the highway alignment or a poor accident record. None of these elements are associated with the proposed development and the proposed signalised improvements at the Lankester Parker Road / Rochester Road junction will assist with reduction in traffic speeds. Any change in speed limit will require a Traffic Regulation Order and would require the approval of both the highway authority and the support of the local constabulary.</p>
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Impact on the Kent Downs Area of Natural Beauty (AONB)

<p>The Kent Downs AONB Unit challenge the Magnitude of Change listed at viewpoints 7, 8, 9 and 10 in the LVIA Addendum.</p> <p>The Kent Downs AONB Unit consider that further development that has occurred in the vicinity of the LDO since the original consultation, alongside the development at IPM, will, <i>“reduce the quality of the views and demonstrate the harm of large scale commercial developments in this location”</i>.</p> <p>The Kent Downs AONB Unit remain concerned about the height parameter in the northern part of the site.</p> <p>Natural England make reference to the height of buildings along the western edge of IPM and</p>	<p>It is acknowledged that the Kent Downs AONB Unit have a difference of opinion on effects assessed for viewpoints 7, 8, 9 and 10. Nevertheless, measures included in section 3.5 of the Design Code, developed in consultation with the AONB Unit, seek to further reduce visual effects on the AONB to ensure buildings are integrated with their surroundings, are visually unobtrusive and make a positive contribution to the AONB.</p> <p>In response to comments from Natural England and following further discussions, all matters have been addressed in the updated Design Code. Further emphasis is made in the Design Code that all buildings visible from the Kent Downs AONB should reflect the requirements set out in Section 3.5. It is confirmed that all buildings along the western edge of the northern site would be 4 stories or less, as per the parameter plan and details of lighting are now</p>
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<p>suggest that design <i>“be sympathetic to the environment in which they sit”</i>.</p> <p>Natural England seek further confirmation as to how the design principles will be applied to the Gateway and Iconic buildings.</p> <p>Natural England advise that the building heights on the western side of Innovation Park Medway are kept as low as possible given the visual impacts that will result from taller buildings.</p> <p>In terms of lighting, Natural England suggests the Design Code should ensure detailed guidance is set out to avoid light pollution.</p>	<p>included in the Design Code which will ensure no light pollution.</p>
<p>Negative Economic Impacts</p>	
<p>A resident was concerned with the loss of the caravan park, and its potential impact on tourism in the Medway towns.</p>	<p>This is privately owned and is subject to the owner wishing to develop and if so, can do so through the LDO. This doesn't restrict the owner from developing the site, i.e. a separate planning application can be submitted for determination.</p>
<p>Design, Layout, Scale and impacts on residents</p>	
<p>Has the proposed development given sufficient consideration to the occupiers of properties off Maidstone and Rochester Road?</p>	<p>The effects of the proposed development on areas beyond the AONB are addressed in the LVIA that accompanied consultation on the Masterplan Statement. Within this assessment, the impacts of buildings proposed on the southern site are considered – Section 6.3 of the LVIA provides an explanation for the design approach to Areas/Parcels 3 and 4.</p> <p>For Area 3, the proposed buildings closest to the residential properties would be up to two storeys (8m), in keeping with heights of neighbouring residential</p>

	<p>properties and limiting the impact on the amenity of these properties.</p> <p>For Area 4, woodland surrounding the Woolmans Wood Caravan Park would be retained and serve to screen or largely obstruct views of the proposed four storey buildings. The proposed buildings would be set back from the trees (and properties to the south), further reducing the visual impact on residential properties to the south.</p> <p>Section 7.2.5 of the LVIA addresses effects on townscape, with reference to properties to the south of the Site. Section 7.3.2 addresses effects on visual receptors to the south of Site (including residential properties).</p>
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Ecology / Biodiversity

<p>A resident has requested assurance that woodland and landscaped areas will be maintained.</p> <p>KCC have requested that further information be submitted demonstrating that proposed on-site and off-site habitat mitigation will be implemented and that proposed species mitigation will be appropriate.</p>	<p>Sale and maintenance of land is and will be a matter for the landowner. Some trees are also protected and are maintained according to appropriate guidance.</p> <p>We have considered the Ecologist’s comments and following a series of exchanges, all matters have now been agreed and an updated Ecological Management and Enhancement Plan (‘EMEP’) has been produced. The EMEP now specifically details on-site habitat creation and species-specific mitigation whilst also identifying off-site mitigation areas.</p> <p>Off-site mitigation has been secured at Horsted Valley and the detail is set out in the agreed EMEP.</p> <p>A condition has also been agreed to ensure developers must <i>submit an Ecological Compliance Note</i> by identifying all relevant plot and site wide prescriptions within the EMEP and including a preliminary ecological appraisal that reviews the existing mitigation and makes recommendations of</p>
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	<p>additional measures if identified. The Ecological Compliance Note must be approved by the Local Planning Authority prior to commencement of development.</p>
<p>Air Quality / Noise Pollution</p>	
<p>The EPO had requested that the dispersion model be rerun, and air quality damage costs revised, based upon the latest Emissions Factor Toolkit (EFT) and Defra source sector costs.</p> <p>Following further discussions, the EPO confirmed that given that the maximum predicted concentrations are comfortably below the respective air quality objectives, it is unlikely that updating the assessment with the latest emissions factors (EFT) will change the conclusions of the assessment and the appropriateness of conditioning air quality mitigation.</p>	<p>Further consultation with Medway's Environmental Protection Officer has confirmed that the Noise Assessment is acceptable and has been carried out using acceptable methodologies.</p> <p>In terms of Air Quality, subsequent to the consultation response there has been further consultation with the Medway Environmental Protection Officer.</p> <p>On the basis that the IPM predicted trip generation remains the same as in the original assessment, which even with the addition of traffic from IPM predicted concentrations of nitrogen dioxide and particulates to be some way below the respective annual mean UK Objective levels, it is considered that subsequent changes to vehicle emissions factors would not lead to a change in the predicted significance of effects set out in the ES. In the context of EIA needing to assess likely significant effects as opposed to all possible effects, this has been discussed with Medway's Environmental Protection Officer and it has been agreed that update to the assessment will not be required because there is sufficient confidence in the assessment for the planning authority to clearly understand the likely significant effects.</p> <p>Following the further consultation with the Medway Environmental Protection Officer and the conclusions set out above, it has been agreed that the Emissions Damage Costs Assessment mitigation figure of c.£1.55m referred to in the LDO does not need to be amended.</p>

	<p>In summary, no further information or updated assessments in relation to either Noise / Air Quality are required.</p>
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6 CONCLUSIONS

- 6.1 Following the initial consultation between June and July 2019 and comments received from consultees including Kent County Council, Highways England, Natural England and the Kent Downs AONB Unit, a number of assessments and further technical work was undertaken to respond to the feedback.
- 6.2 This work has been completed over the last 12 months and the findings were set out in the addendums to the Environmental Statement, updates to the Design Code and revisions to the LDO that were consulted on between 26th October to 27th November 2020 for Medway and 29th October to 30th November 2020 for TMBC.
- 6.3 This Statement has shown how both Medway and TMBC have effectively engaged with the local community, statutory consultees and relevant stakeholders in the development of the LDO and Design Code for IPM.
- 6.4 In summary, following the work over the last 12 months, liaison with the relevant parties and recent engagement, the views of the public, statutory consultees and key stakeholders have all now been addressed and incorporated within updates to the LDO, Design Code and EMEP as necessary, and there are no objections to the development.