

Appendix D

CONSULTATION STATEMENT

Innovation Park Medway

Local Development Order and Design Code

SUBMITTED BY MEDWAY COUNCIL AND TONBRIDGE & MALLING BOROUGH COUNCIL

OCTOBER 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 Innovation Park Medway ('IPM') Design Code ('Design Code'). 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 submitted as part of the proposals for IPM and details the consultation undertaken in relation to the LDO and Design Code only.

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 refinement of the LDO and Design Code. In doing so, it will be made clear in this report what comments have been received, how the comments have been addressed and a justification provided where not possible.

Structure

- 1.4 Section 2 sets out 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

- 1.5 LDOs are recognised in the National Planning Policy Framework ('NPPF') at paragraph 51 as a means of setting the planning framework for a particular area where the impacts would be acceptable and where it would promote economic, social or environmental gains.
- 1.6 This LDO will provide certainty to the type, use and form of development at IPM and in return, facilitate economic growth and allowing firms / 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.
- 1.7 This LDO will create high skilled jobs and drive innovation that will secure growth and prosperity in the region and to realise 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 by the Council to be key target areas.

Design Code

- 1.8 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. By following the design guidance 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 LDOs are recognised in the National Planning Policy Framework ('NPPF') at paragraph 51 as a means of setting the planning framework for a particular area where the impacts would be acceptable and where it would promote economic, social or environmental gains.
- 2.2 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.
- 2.3 Paragraphs 39-46 of the NPPF set out that all applicants are expected to work closely with those directly affected by their proposals, therefore taking into account the view of the community.
- 2.4 The NPPF specifically states at Paragraph 39:
- "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" (Paragraph 39).*
- 2.5 As dictated by Planning Practice Guidance (PPG), public consultation may be beneficial if development is expected to have a particularly significant impact.
- 2.6 Any consultation should allow adequate time to consider representations and, if necessary, amend proposals.
- 2.7 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

- 2.8 Consultation was undertaken in accordance with best practice and from the outset, both Medway and TMBC committed to stakeholder and community engagement and a comprehensive strategy was designed to

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

enable as many people as possible to have the opportunity to learn about the development and provide feedback. The feedback received was then taken into consideration as the LDO and Design Code evolved.

- 2.9 As development at IPM required an Environmental Impact Assessment ('EIA'), in accordance with the EIA Regulations, each 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 and sought the involvement of a wide range of consultation bodies including businesses.
- 2.10 A range of engagement methods were used to promote the consultation in order to make contact with a good cross-section of stakeholders and this is detailed in Section 3.
- 2.11 The objectives for the engagement strategy are set out below:
- To engage with local residents and key stakeholders to help them fully understand the LDO and Design Code;
 - To build resident and stakeholder confidence in the development process through directing them to all 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.
- 2.12 Following feedback received, a further consultation period is being undertaken to demonstrate how the comments have been addressed. This consultation period will also allow for feedback on the additional information submitted in support of the LDO.

Use of Information Gathered

- 2.13 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-Bulletin

- 3.1 In June 2019, designated pages were set up on both Medway's and TMBC's websites² including a summary providing an overview of the previously consulted Masterplan, the emerging LDO, Design Code and Environmental Statement and explained how the process of Prior Notification would work. Each webpage directed local residents and interested parties to the suite of supporting technical information and documents and encouraged comments to be submitted during separate consultation events (17th June 2019 and 19th July 2019 for Medway and between 20th June and 22nd July for TMBC).
- 3.2 Accordingly, both Medway and TMBC have worked together to jointly prepare and consult on two separate LDOs before each adopting their own version.
- 3.3 TMBC also placed notification of the consultation in their e-bulletin on 20 June 2019 alongside social media messaging.

Letter Drop

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

Notification in Local Newspaper

- 3.5 An advert was placed in the Medway Messenger by Medway on 17th June 2019 and the Kent Messenger by TMBC on 20th June 2019.

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 proposals:
- Environment Agency;
 - Historic England;
 - Natural England;
 - Highways England;
 - Kent County Council;
 - Neighbouring authorities and Parish Councils; and
 - West Kent Clinical Commissioning Group; and
 - Utility Providers.

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

3.7 Contact was also made with key stakeholders who 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; and
- Various other parties that are consulted on any other Local Plan documents.

4 FEEDBACK

- 4.1 Given the cross boundary and strategic nature of the LDO, there was a high level of interest during the public consultation and engagement period. This is detailed in the section below.

Website

- 4.2 The designated pages for Medway³ had 246 views. Of these, 203 were unique, meaning that 43 people had viewed the webpage viewed it more than once.
- 4.3 Those who visited spent an average of 1 minute 38 seconds.
- 4.4 In terms of residents, 35 responded (32 objecting to the LDO, 2 in support and 1 neutral) and whilst the general tone of the feedback was one of objection, there was significant support for the creation of employment opportunities. In terms of the statutory consultees / key stakeholders, 11 responded.
- 4.5 In respect of TMBC, 15 comments were submitted with 10 objections from residents and 5 responses from statutory consultees / key stakeholders.

Statutory Consultees and Other Key Stakeholders

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

Highways / Traffic

- 4.7 Both KCC and Highways England ('HE') raised concerns with the capacity of local roads and junctions and highlighted, the need for robust assessment. Specifically, HE queried the source of base traffic data, questioned how the Cambridge Science Park trip rates were comparable and expressed a need for the *"proposed mode share to the person trip rates (0.65 mode share of vehicle trips) needs to be backed up by more evidence"*. HE also requested a need to *"consider the impacts on not only the M2 junction 3 (the closest junction to the site), but also on SRN junctions further afield, in particular the M2, junctions 4 and 5, and the M20 junction 6"*.
- 4.8 KCC asked whether the *"Bridgewood Roundabout improvements be more fully investigated and then implemented by the developer"*.

Building Height / Design

- 4.9 The Kent Downs AONB Unit and Natural England highlighted the need to account for potential impacts to views and tranquillity of the Kent Downs AONB. Specific reference was made to the height of building need

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

to be considered to minimise the potential impact on views from the AONB which is considered to be of paramount importance, and in view of the national significance of the AONB designation, it should be this that informs maximum heights, not just acceptable heights relative to distances from the runway.

- 4.10 The same respondent suggested they were concerned the BAE buildings have been used as a benchmark to inform the acceptable height of new buildings.

Noise / Air Quality

- 4.11 Natural England highlighted the need for a detailed traffic generated air quality assessment to understand whether the proposal will result in impacts to the North Downs Woodland SAC, either alone or in-combination with other plans or projects.
- 4.12 Medway's Environmental Protection Officer also questioned whether the data used was the most up to date. Specific comments were made in reference to ensuring comprehensive cover of the potential area of impact for the development was assessed.

Ecology

- 4.13 Both Kent County Council ('KCC') and the Council's Greenspace Access and Bidding Programme Manager made reference to bio-diversity net gain and off-site mitigation and specifically requested a detailed Mitigation Strategy to be submitted as part of a Condition. The Bidding Programme Manager also suggested the "*Site is ideally place to achieve off site compensation via Horsted Valley and Nashenden Valley. Hopefully this can be reflected in the EMEP*".
- 4.14 Whilst Kent Wildlife Trust ('KWT') support the development, they specifically requested that the masterplan sets out clearly the Green Infrastructure elements that, "*deliver biodiversity net gain; and integrate functional habitats within the public areas and alongside 'grey infrastructure'*".

Residents

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

Highways, Traffic and Congestion

- 4.16 Respondents raised concern about the proposed impacts on the highway network and subsequent generation of increased traffic and congestion.
- 4.17 Respondents also commented on the already lack of infrastructure and how the proposal would create rat runs through the surrounding residential estates.
- 4.18 Specific comments made by respondents included:
- "*How do the Council expect the local roads to cope with the higher volume of traffic*".

- *“Development will have major problems with traffic movement which is already at breaking point”.*
- *“The roundabout system at Taddington Woods and Lord Lees is grid locked every rush hour. To bypass this, traffic uses the Davis Estate as a rat run”.*

Impact on the Kent Downs Area of Natural Beauty (AONB)

4.19 Reference was made to the potential impact of the proposed development on the Kent Downs AONB and in particular, how the proposed increase in the number of flights will impact upon the tranquillity of the AONB.

4.20 Specific comments made by respondents included:

- *“The possible impacts of all flights using a single runway over the M2 / HS1 and ANOB have not been assessed”.*
- *“Impact on AONB / tranquillity not been fully assessed – how will the delivery of the infrastructure not impact on the AONB?”*

Design, Layout, Scale and impacts on residents

4.21 Respondents queried the design of the pedestrian link between the North and South sites, the height of proposed buildings on the South site and comments were also raised in relation to the loss of trees and whether the South site was actually required.

4.22 Specific comments made by respondents included:

- *“the proposed footpath between the North and South sites would be less likely to become a robber's paradise, where isolated workers leaving work late and walking back to their cars would be easy targets”.*
- *“I seriously object to the building of anything (especially a 6 storey car park) which will increase congestion and effectively keep me a prisoner in my own road”.*
- *“The loss of trees, with the present concern over climate change will be irresponsible”.*
- *“Is there any actual need for a South site? Parcel 4 is currently being used to store caravans and motorhomes for local residents, where would these go?”*

Negative Economic Impacts

4.23 Respondents suggested the proposal will increase rent prices in the local area which will be of the detriment of local residents.

4.24 Specific comments made by respondents included:

- *“Development will affect the rent prices in Medway; many already struggle to stay financially stable whilst living in the area due to sky high rent prices and wages that aren't anywhere near high enough to cover it”.*

- *“Far from enhancing the local economy this will have a negative effect on businesses across a large swathe of North West Kent when workers, products and supplies are unable to go where they need to go”.*

Impacts on Existing Airport

4.25 Respondents raised concerns relating to the impacts on the future operation of the Airport and the assumption that the development of IPM is the first step to closure.

4.26 Specific comments made by respondents included:

- *“I have not seen any consultation request to the Civil Aviation Authority, could it be a deliberate oversight in the hope that the CAA will revoke the airfield licence at a later date which would enable further expansion”.*
- *“My main concern is the Airport being jeopardized by building over the North / South runway”.*
- *“Can Air Traffic Control cope with the increase in the number of flight movements?”*

Existing Employment Uses

4.27 Respondents further expressed concerns that investment should instead be directed into already existing employment sites. Comments considered the proposed regeneration unsustainable due to the already existing high level of vacant employment spaces in the area.

4.28 Specific comments made by respondents included:

- *“Plenty of empty lots in other business parks in Medway. Why do we need to build on a field if this is the case? It seems a pointless project that will have a negative effect on the environment. Fill your other vacant lots across Medway first”.*
- *“Why can't you use already available buildings which have remained empty for years, Medway City Estate, Gillingham Business Park being examples, this development requires one of the two remaining runways to close”.*
- *“There are plenty of other places in Medway that would be more suitable and which would not have such a negative impact this will most definitely have if these plans are permitted to go ahead”.*

Noise and Air Quality

4.29 Concern was also raised about the potential of the site to generate increased levels of noise and air pollution. This was specifically in relation to increased traffic movements.

4.30 Specific comments made by respondents included:

- *“The increased air pollution from this traffic will be a cause for concern”.*

- *“Area already recognised as highly trafficked no figures are given for additional air pollution from vehicles visiting”.*
- *Full Noise Impact Assessment required that takes into account Significant Observed Adverse Effect Level (SOAEL) and Lowest Observed Adverse Effect Level (LOAEL).*

4.31 An element of the proposals respondents liked included:

Creation of employment opportunities

4.32 A number of respondents confirmed they were in support of the creation of employment opportunities, despite having other concerns.

4.33 Specific comments made included:

- *“I generally support the plan if genuine skilled jobs are created that could link with the redeveloped and updated airport”.*
- *“Simple to say I am for this development, it is much needed for our area. More jobs are welcomed and it’s good to see Chatham, Medway leading the way forward for local opportunities”.*

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 being provided or via direct liaison with the relevant party where necessary.

Highways, Traffic and Congestion	
Query	Response from appointed consultancy team
<p><i>Mitigation measures including the feasibility and deliverability and whether the measures proposed will realistically lead to improvement in capacity should be properly investigated and determined.</i></p> <p><i>In order to verify the growth factor, Highways England need to see the TEMPRO output to assess if appropriate parameter selections have been made to determine the factor and to be provided with additional information with regards the development trip distribution and modelling especially with regards a need to consider the impacts on not only the M2 junction 3, but also on SRN junctions further afield, in particular the M2, junctions 4 and 5, and the M20 junction 6.</i></p> <p><i>Further clarification / up to date evidence is requested on the following:</i></p> <p><i>Proposed mode share to the person trip rates (0.65 mode share of vehicle trips)</i></p> <p><i>Trip generation of the B1 and B2 land uses would need to be considered, which could be higher.</i></p> <p><i>The Scoping Report proposes controlling specific trip generation of each end-user development through a planning condition. Once further information has been provided and we are content that the proposed trip generation is realistic, we would welcome a discussion on how such a planning condition could be worded and what penalties would be applied should the trip generation limit be exceeded.</i></p>	<p>Further consultation with Highways England and KCC Highways confirmed that the basis for the trip rates used within the TA is acceptable and the impact of IPM with the wider Local Plan traffic has been included within the 2020 updates to the Medway Council Strategic Transport Assessment model. On the basis that the proposed vehicle trip rates have been accepted by Highways England, the Transport Assessment has not required update in terms of projected development flows but it has been updated to reflect further work that has been undertaken on the design of mitigation for junctions affected by traffic from IPM.</p>

<p><i>Need to consider the potential variation in trip generation between B1a, B1b, B1c and B2.</i></p> <p><i>Census data needs to be provided (including location details) in order to verify if the resulting distribution percentages are accurate.</i></p> <p><i>Modelling of the Lower Thames Crossing (LTC) have been undertaken.</i></p> <p><i>Proposed mitigation for in the vicinity of the M2 Junction 3 needs to be understood.</i></p> <p><i>Need to consider construction traffic.</i></p>	
<p><i>Could the Bridgewood Roundabout improvements be more fully investigated and then implemented by the developer?</i></p> <p><i>At the Lord Lees Roundabout, the results indicate that it would be unlikely that queues would block back or interact with the M2 Junction 3. The operation of the junction 3 of the M2 needs to be investigated and to understand whether reassigned traffic is impacting at another location on the SRN.</i></p> <p><i>Taddington Wood Roundabout - need to understand this reassignment in more detail to consider whether reassigned traffic is impacting at another location on the SRN.</i></p> <p><i>Need for mitigation measures to be fully investigated.</i></p>	<p>Mitigation designs have been produced for these three roundabout junctions and a Stage 1 Road Safety Audit has been undertaken, along with a Designer's Response which has been reviewed by KCC and Highways England. The Designer's Response reflects each of the comments raised by the independent Road Safety Audit team and explains how these comments will be appropriately incorporated within the next stage of design for the junctions.</p>
<p>Impact on the Kent Downs Area of Natural Beauty (AONB)</p>	
<p><i>Impact on AONB / tranquility has not been fully assessed – how will the delivery of the infrastructure not impact on the AONB?</i></p>	<p>Further consultation has been undertaken with Natural England on this, and other points on the AONB. A statement regarding aviation movements at the Airport and the lack of influence on these from IPM has been issued to Natural England in August 2020 by Medway Council.</p>
<p><i>The AONB Unit considers the proposed height of buildings would fail to conserve or enhance the special qualities and character of the AONB.</i></p>	<p>In response, further consultation has been undertaken with Natural England and the Kent Downs AONB Unit together with other points in relation to the AONB and a revised Addendum which provides further information on visual matters relating to key areas within the AONB and provides clarification for the judgments reached in Chapter 11 of the Environmental Statement.</p> <p>In addition to supplementary material supporting the LVIA, a standalone AONB section has been incorporated into the Design Code, providing more</p>

	<p>guidance on measures to further reduce impacts on the AONB, an approach that was agreed with Natural England and the AONB Unit.</p>
<p><i>Views from other parts of the AONB and in particular views from the North Downs Way in the vicinity of where PRow MR6 joins the North Downs Way, are highly likely to be much more visible in the future as a result of ash die back.</i></p>	<p>Assessing unpredictable future baseline change is not part of the ES LVIA methodology and as such assessing the future baseline following potential ash die back was not undertaken.</p> <p>However, the assessment of the North Downs Way, as set out in section 11.6.30 of the ES, assess views through gaps in vegetation and during winter months. Where more open views are available, in the vicinity of PRow MR6, the existing buildings of adjacent industrial and employment areas are clearly visible.</p> <p>The LVIA addendum includes a viewpoint taken in the vicinity of PRow MR6 (see viewpoint 10). The scale of effect would be Small-Negligible and of Slight significance.</p> <p>In February 2020, a site visit was undertaken to capture views from the AONB during winter months. The supplementary note was produced that contains photopanel and visualisations.</p>
<p>Design, Layout, Scale and impacts on residents</p>	
<p><i>Could the development draw more positively on the site's airfield history?</i></p>	<p>The masterplan statement, which provides illustrative guidance on how the site could be brought forward and developed, features a runway park on the alignment of runway 16/34, which is currently laid to well-maintained grass. This feature becomes the fundamental structuring element of the masterplan, inspired by making a 'nod to the past' whilst setting out a confident new future for the site.</p> <p>Section 5 of the accompanying design code offers guidance on how the brand and identity of IPM, and its physical features, can reinforce perception of the site heritage.</p> <p>Where possible, features of the site will be retained.</p>
<p><i>Is there any possibility of encouraging more pedestrian connections from outside the park / better linkages with the Davis Estate?</i></p>	<p>Provision has been made for three access points to the northern site off Laker Road, all of which will accommodate pedestrians. A potential long-term access to the northern site may be provided off Marconi Way (off Maidstone Road) subject to agreement from BAE Systems, who operate a secure site.</p> <p>Pedestrian access to the southern site will be gained off Maidstone Road / ICM access roundabout. Whilst the airport restricts the east-west movement of</p>

	<p>pedestrians from Maidstone Road, the two development areas (north and south) have the potential to be physically linked via a footpath that passes securely along the site boundary.</p>
<p><i>What is proposed for the empty plots before they are developed? Could they be temporary open spaces until building work starts?</i></p>	<p>Temporary use of empty plots has been discussed with Medway Council but not included as this relates to site management rather the applications dealt with through the LDO mechanism. Temporary open space, wildflower meadows, and temporary surface parking are all options.</p> <p>Plots could be sown with wildflower mixes to provide habitats for invertebrates and provide temporary stepping stone habitat between airfield grassland to be lost and future green roofs or other habitat on site once development is completed.</p>
<p><i>Phasing: Will all the public realm go in straight away ready for when people view, move in – supporting the early occupiers?</i></p>	<p>The masterplan proposes a fundamental structure formed by the linear park and primary access corridor. The indicative approach to phasing focuses on the delivery of key infrastructure, including the first portion of the linear Runway Park. This will build momentum for the identity of the place and, from the outset, start to address the challenges of creating a flourishing place with a strong community. The first phases delivered at IPM are intended to set the standard that all later phases follow.</p> <p>Each subsequent phase of development at IPM will focus on delivery of key pieces of public open space to complete the network envisaged.</p>
<p><i>Public realm - what measures will be put in place to maintain these areas to a high quality?</i></p>	<p>Maintenance and ownership of landscape and public realm to be undertaken by Medway Council.</p>
<p><i>Have green walls been considered on any of the buildings?</i></p>	<p>Building façade materials are not prescriptive but green walls were proposed as an option for Parking Deck plots. Encouragement to explore naturalistic character was also provided for Woodland Plots although noting that facades and roof-scapes should consider maintenance strategy and whether potential roosting and nesting could contribute to risk of bird strike on the airfield.</p> <p>As set out in the EMEP, brown and green roofs are suitable for the site and the detail of green walls are included in the AONB Addendum.</p>
<p><i>Height of building through the site especially on the southern site?</i></p>	<p>As noted above, a revised Addendum which provides further information on visual matters relating to key areas within the AONB and provides clarification for the judgments reached in Chapter 11 of the Environmental Statement.</p> <p>Effects on areas beyond the AONB (including those to the east of the site) are addressed in the LVIA that</p>

	<p>accompanied consultation on the Masterplan Statement. Within this assessment, effects of buildings proposed on the southern site are considered in the context of nearby commercial development along Maidstone Road, including Innovation Centre Medway, and are considered to be of an appropriate scale.</p>
<p><i>Site security – how will the relationship between the new area of commercial development and the existing operations of BAE be managed?</i></p>	<p>Medway Council has regular meetings with BAE and the design code has sufficient flexibility for perimeter fencing as required for BAE.</p>
<p><i>How will the loss of car parking from Phase II be addressed to ensure the existing operations of BAE can still be served?</i></p>	<p>Proposals under the IPM masterplan include decked car parking to increase parking capacity on the site.</p>
<p>Impacts on Existing Airport</p>	
<p><i>Use of the single runway – how will this impact the number of flights / operation of the Airport / Airfield?</i></p>	<p>The closure of the runway was dealt with through a previous application and has nothing to do with the LDO. Supporting information from the runway planning application confirmed the closure of the existing runway is likely to reduce the overall number of flights from the airport compared to the current baseline because there will be a reduction in the flexibility of take-off and landing direction and for some aircrafts using the airport cross-winds of certain strengths, will exceed the parameters of their engines and they will not be able to take off or land. This predicted effect was also confirmed through an independent report prepared for the runway planning application.</p>
<p>Ecology / Biodiversity</p>	
<p><i>Both Kent County Council ('KCC') and the Council's Greenspace Access and Bidding Programme Manager made reference to bio-diversity net gain and off-site mitigation and specifically requested a detailed Mitigation Strategy to be submitted as part of a Condition. The Bidding Programme Manager also suggested the "Site is ideally place to achieve off site compensation via Horsted Valley. Hopefully this can be reflected in the EMEP".</i></p> <p><i>Whilst Kent Wildlife Trust ('KWT') support the development, they specifically requested that the masterplan sets outs clearly the Green Infrastructure elements that, "deliver biodiversity net gain; and integrate functional habitats within the public areas and alongside 'grey infrastructure'".</i></p>	<p>In response, BSG liaised with the Kent Wildlife Trust and agreed bio-diversity net gain ('BNG') would be best secured through an Ecological Management and Enhancement Plan (EMEP) which has now been agreed and is included in the LDO. Through the production of the EMEP, Horsted Valley has been identified along with Daisy Banks and Coney Banks and the necessary level of mitigation has been costed.</p>

Existing Employment Uses	
<i>Why can't existing buildings which have remained empty for years be used?</i>	<p>Existing buildings in Use Class E(g)(i-iii) or Use Class B2 within Medway and Tonbridge & Malling are not to the required standard for the intended uses at IPM.</p> <p>One of the intentions of IPM is for businesses to benefit from the cluster of similar industries. This would not be possible anywhere else within Medway or Tonbridge & Malling.</p>
Air Quality / Noise Pollution	
<i>Concerns raised about the potential of the Development to increase levels of noise / air pollution.</i>	<p>An air quality impact assessment submitted as part of the Environmental Statement confirmed that there would be no significant impacts. By virtue of the predicted reduction in total flights through the closure of one runway (an application that was separate from this LDO), there is no significant increase in noise or air quality from aviation, as a secondary effect of the LDO proposals.</p> <p>No significant impacts are likely associated with noise and this is the reason that noise was not included within the scope of the EIA.</p> <p>Significant impacts are not predicted for air quality in terms of the UK Air Quality Strategy Objectives but a parallel assessment has been undertaken using the Emissions Damage Calculation approach and this has identified a financial level of mitigation that will be required in relation to air quality.</p>
<i>Natural England highlighted the need for a detailed traffic generated air quality assessment to understand whether the proposal will result in impacts to the North Downs Woodland SAC, either alone or in-combination with other plans or projects.</i>	<p>An air quality assessment on potential impacts to the North Downs Woodland SAC was included as Chapter 6 of the ES. Since submission of the LDO application, further consultation has been undertaken with Natural England on this and a technical note has been submitted explaining how the Strategic Transport Assessment (STA) model takes account of projected traffic growth within adjacent local authority areas. Natural England has confirmed that, on the basis that Highways England is content with the STA modelling methodology, this will present an appropriate basis for the assessment of cumulative and in-combination effects on the North Downs Woodland SAC and a revised Air Quality Assessment has been submitted as part of the ES Addendum to take account of the updated STA model, particularly in respect of cumulative and in-combination effects on the SAC.</p>

6 CONCLUSIONS

- 6.1 Early and effective engagement has been undertaken, notably during the online consultation held from 17th June 2019 to 19th July 2019 for Medway and between 20th June and 22nd July for TMBC.
- 6.2 As a consequence of this engagement and feedback received from consultees including KCC, Highways England, Natural England and the Kent Downs AONB Unit, a number of assessments and further technical work was identified and this has been undertaken over the last 12 months and the conclusions are captured within addendums to the Environmental Statement, updates to the Design Code and revisions to the LDO.
- 6.3 In summary, the views of the public, statutory consultees and key stakeholders were all considered and, where relevant have resulted in revisions to the LDO and Design Code. The revised documents are now subject of further consultation between 26th October to 27th November for Medway and 29th October to 30th November for TMBC.
- 6.4 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.