Appendix C

CampbellReith
consulting engineers

Medway Council

Innovation Park Medway
Environmental Statement Addendum
Non-Technical Summary

For

INNOVATION PARK MEDWAY

Project Number:

12841

October 2020

Campbell Reith Hill LLP
Raven House
29 Linkfield Lane
Redhill
Surrey RH1 1SS

T:+44 (0)1737 784500
F:+44 (0)1737 784501
E:surrey@campbellreith.com
W:www.campbellreith.com

Document History and Status

Revision	Date	Purpose/Status	File Ref	Author	Check	Review
D1	Jan 19	Review	12841	SMG	SRB	SRB
D2	Feb 19	Additional section	12841	SMG	SRB	SRB
D3	May 19	Additional section	12841	DWS	SRB	SRB
D4	October 20	Addendum version	12841	DWS	SRB	SRB

Document Details

Last saved	22/10/2020 07:09
Path	ES_Addendum_Non_Technical_Summary_CON20.doc
Author	DWS
Project Partner	SRB
Project Number	12841
Project Name	Innovation Park Medway

Contents

Figures

1.0 WHAT IS AN ENVIRONMENTAL STATEMENT AND ENVIRONMENTAL IMPACT ASSESSMENT?

1.1. Context and background

1.1.1. This document is an updated version of the Non-Technical Summary (NTS) of the Environmental Impact Assessment (EIA) prepared as part of the application for Local Development Orders (LDOs) for a development called Innovation Park Medway (IPM). Key changes compared to the NTS submitted with the original LDO application have been highlighted in a blue font. The use of coloured font to identify where new text or figures have been added is to assist ease of identification for those consultees that have already read the previously submitted NTS.

1.1.2. Medway Council and Tonbridge and Malling Borough Council (herein jointly referred to as the 'Applicant'), submitted an application for an LDO in June 2019 on land adjacent to Rochester Airport (MC/19/1556).

1.1.3. The LDO application was supported by a range of technical assessments including an Environmental Statement (ES), which presents the findings of an EIA of the Proposed Development.

1.1.4. The LDO proposes a total of 101,000 sqm of predominantly high-tech and innovation oriented business and employment uses. The design of IPM is described within Chapter 4 of the ES submitted as part of the LDO application and will involve the following:

- A runway park – providing a clear identity and provide high quality open space, whilst reflecting on the site's aviation history;
- Iconic Buildings – the masterplan includes two 'book-ends' along linear alignment diagonally through the site which aims to link the two development areas;
- Pedestrian friendly clusters – car parks located in strategic locations allowing free-flowing pedestrian movements and pedestrian clusters to form in the key open spaces, and a pedestrian link between the two development areas;
- Landscape character areas – consisting of orchard planting, open lawn spaces, meadows, woodland clusters/woodland walk, park edge plots, a boulevard, and outdoor collaboration spaces proposed through using innovative technology design in the landscape;
- Primary gateway spine – a key feature will include the distribution of B1 business employment spaces along this gateway spine to promote active frontages onto key routes;
- Drainage design – a surface water drainage scheme based upon a range of infiltration techniques and will be employed through the use of swales, open storage structures along landscaped green corridors.

1.1.5. An ES reports the findings of the EIA process, which itself is a mechanism by which likely significant environmental effects are assessed. The purpose of the EIA process is to ensure that the appropriate information about likely significant environmental impacts of a project or proposal is available for consideration by the Local Planning Authority (LPA), statutory consultees and the public. Using this information the LPA can then make an informed decision about the proposals.

1.1.6. The EIA process can identify ways in which the project can be modified, or significant impacts mitigated (that is, reduced) to avoid adverse negative impacts, and enhance positive, beneficial impacts.

1.1.7. The EIA has been undertaken in accordance with the Town and Country Planning (Environmental Impact Assessment) Regulations 2017 (Statutory Instrument 2017:571), as amended (referred to in this report as 'The EIA Regulations').

1.1.8. This document provides a summary of the findings of the ES in, as far as is practical, non-technical language, and forms Volume 3 of the ES.

1.2. Reason for the ES Addendum

1.2.1. Subsequent to the submission of the LDO application and receipt of consultations responses, engagement has continued with the LPA, Kent County Council (as highway authority), Highways England, Natural England, the Kent AONB Unit and a range of other consultees. The result of the ongoing consultation is that assessment updates have been undertaken in the following topic areas:

- Update to the Medway Council Strategic Transport Assessment (STA) model, which provides the background traffic context to the Transport Assessment and Ecological Assessment submitted as part of the ES within the LDO application;
- Preparation of preliminary junction mitigation designs for the Bridgewood, Lord Lees and Taddington roundabouts;
- The views of IPM from the Kent Downs Area of Outstanding Natural Beauty (AONB).

1.2.2. In addition, there has been ongoing consultation with Natural England regarding its comments during the initial consultation period on whether the IPM development would have any effect on aviation movements across the AONB, and whether this would have a significant effect on the tranquillity of the designated area.

1.2.3. An Addendum has been produced and issued for consultation to explain the additional and updated assessment work that has been undertaken and how this relates to the assessments submitted within the ES. The Addendum forms part of the original EIA and it should therefore be read in conjunction with the original ES. The NTS is an important part of the ES and has therefore been reviewed to ensure that it reflects the additional assessment work that has been undertaken.

1.2.4. The intention is that this version of the NTS should be read holistically, without the need to cross-reference to the version originally submitted with the LDO application.

2.0 PROJECT LOCATION AND SITE DESCRIPTION

2.1.1. Innovation Park Medway (referred to in this document as 'the site') will be situated on land at Rochester Airport, Kent. Rochester Airport is a general aviation aerodrome, situated approximately 3.5 kilometres south of Rochester and Chatham town centres, and 57 kilometres southeast of Central London. The site location and LDO application line boundary are shown in **Figure NTS1**.

2.1.2. The site falls within both Medway Council and Tonbridge and Malling Borough Council administrative areas. As such, both authorities are working collaboratively towards development of the site.

3.0 PROJECT BACKGROUND – 2014 MASTERPLAN AND 2018 MASTERPLAN STATEMENT

3.1.1. The Applicant is seeking to establish Local Development Orders (LDOs) for the site in accordance with section 61A of the Town and Country Planning Act 1990. There will be an LDO for each planning authority and the objective of the LDOs is to enable a simplified approach to development consent within the defined area of the site, and in doing so to provide support for economic development and job creation.

3.1.2. The LDOs establish a set of fixed criteria (referred to as 'parameters') for subsequent development within the site, including the total area of built development that would be permitted, the type of development that would be permitted and maximum building heights. The EIA assesses the likely significant impacts of the maximum amount of potential development within the site based on these parameters.

3.1.3. Rather than applying for planning permission, an applicant wanting to develop a plot at the site can apply to the relevant Local Planning Authority using a self-certification form detailing the proposed development scheme, in accordance with the LDO parameter. This approach is both cost and time effective to the applicant.

3.1.4. The development proposals are based upon the original Rochester Airport Masterplan, which was adopted by Medway Council as a Supplementary Planning Guidance document in 2014.

3.1.5. This envisaged creating a hub for knowledge-based employment, whilst preserving the function of the airport. The 2014 Masterplan proposed the closure of one of the runways in order to release land for the creation of up to 1,000 jobs.

3.1.6. Further detail on the Proposed Development was provided in 2018 in the Innovation Park Masterplan Statement, which forms the basis for the current LDO applications. This comprised two stages; an Interim Draft, and a Consultation Draft, which added the conclusions of the technical studies that had been undertaken to support the masterplan.

3.1.7. The key change in the 2018 Masterplan was the addition of the "runway park", an area of open space sitting on the alignment of a runway that is to be closed to aviation uses. The aim of this area is to provide a high quality open space at the heart of the development. It also provides opportunities to integrate sustainable drainage features into the design.

3.1.8. The Masterplan Statement also fixed the aspirational size of development of the site at approximately 101,000 sqm.

4.0 PROJECT DESCRIPTION

4.1.1. The Applicant aims to strengthen the performance of the local economy, create jobs to secure growth and prosperity and to retain skills from within a strategic location within the Thames Gateway. IPM looks to attract businesses within the following sectors:

- Technology;

- Advanced manufacturing; and
- Knowledge-intensive businesses.

4.1.2. The ambition for both Medway Council and Tonbridge & Malling Borough Council is to develop a high quality commercial environment of employment land uses that can attract high value businesses, offering skilled employment opportunities, building upon the success of the current Innovation Centre on the eastern side of the Airport. The overall aim of the proposed development is to enable entrepreneurial growth, strengthening links between local academic schools, universities and industrial partners.

4.1.3. The LDOs will permit the erection of up to 101,000sqm of buildings providing employment uses including offices, research and development, light industrial uses and general industrial uses. The focus of development within the site is envisaged to be on innovative or high-technology businesses.

4.1.4. The employment buildings within the site are to be provided with associated means of access, distributor and service roads, multi-storey parking facilities, footpaths and cycle ways, sustainable drainage systems and landscaping. The masterplan is shown in **Figure NTS2.**

4.2. Parameter Plans

4.2.1. Parameter plans provide the basis upon which the LDOs can proceed. They provide both guidance and limitations to the development that can take place on the site. In this instance, the proposals fix the parameters for building height, access and movement, and landscape and open spaces. These are described below:

Building heights

4.2.2. Building heights will generally vary from 2-6 storeys. The operation of Rochester Airport places height restrictions over a large proportion of the northern area of the site, therefore development closest to the remaining runway in the northern area is limited to up to 2 storeys. The remaining heights for development in the northern area are mainly limited to up to 3 or 4 storeys, with development in the centre up to 5 storeys and the key landmark building up to 6 storeys.

4.2.3. In the southern area, development is anticipated to be up to 4 storeys with a 2 storey building in the south east of the southern area. The parameters for the building heights are illustrated on **Figure NTS3**.

Access and movement

4.2.4. The proposed development would provide a permeable network of streets that allows pedestrians, cyclists and vehicles to move through the site and to connect with surrounding communities. The masterplan envisages a key gateway spine road with primary and secondary access points, potential long term access points and potential pedestrian connections between the northern and southern areas. These elements are shown in **Figure NTS4**.

Landscape and Open Spaces

4.2.5. The proposed development will retain and accentuate green features within the site to provide a high quality environment, habitats and wildlife corridors. Open, high quality, attractive green spaces and planting will aim to put people in touch with nature providing a seasonal set piece and flexible events space.

4.2.6. The combination of retained and created landscape and open space within the proposed development will provide an ecological network of retained and additional habitats for a range of flora and fauna which will maximise the potential to support biodiversity within the site. Parameters relating to landscape provision are shown in **Figure NTS5**.

5.0 SCOPE OF THE ENVIRONMENTAL STATEMENT

5.1.1. Only projects that are likely to have significant environmental effects are subject to EIA. In order to guide this, the EIA Regulations specify a procedure (referred to as 'screening') to establish whether a project requires an EIA. This is based on the various development size thresholds specified within the EIA Regulations. These thresholds describe types of projects and their scale that are likely to give rise to significant environmental effects.

5.1.2. If the need for EIA is confirmed, this can be followed by an exercise referred to as 'Scoping' which determines which specific elements of the project are likely to give rise to significant environmental effects and how these are to be considered within the EIA.

5.1.3. The need for EIA has been determined following a request to Medway Council for a screening opinion. In this case, the request also incorporated a request for a scoping opinion as to the scope of the ES. This 'Request for a Screening and Scoping Opinion' was submitted on 5th October 2018 and subsequently updated and re-submitted on 2nd May 2019. As a result of this request, Medway Council sought comment on this request from:

- Environment Agency (EA)
- Natural England (NE)
- Kent County Council Biodiversity
- Kent County Council Archaeology
- Medway Council – Highways
- Medway Council – Environmental health
- Historic England
- Kent Downs Area of Outstanding Natural Beauty Team

5.1.4. The following topics have been "scoped in" to the assessment, with the associated potentially significant effects:

Air Quality

- Impact on surrounding Air Quality Management Areas;
- Dust generating activities – construction and operation.

Community, Social and Economic

- Demography of the surrounding area;
- Employment associated with new employment floor space;
- Economic effects of the new floor space;
- Local environmental amenity during construction (to be considered within other relevant chapters).

Human Health

- Related to effects on air quality and ground contamination to be addressed within specific chapters.

Ground Conditions

- Unexploded Ordnance (UXO) associated with previous use as a military airfield;
- Risk of contamination on the site and a sensitive aquifer beneath the site.

Landscape and Visual

- Possible effects on the Area of Outstanding Natural Beauty, sensitive views and landscape character.

Natural Heritage and Ecology

- Sites designated with ecological interest - Wouldham to Detling Escarpment SSSI and North Downs Woodland SAC – are potentially affected by nitrogen deposition and with exceedances of critical loads.

Traffic and Transport

- Effect of traffic flows to include abnormal dangerous loads during construction, driver severance, delay, accidents and safety;
- Need for junction capacity improvements on the local road network;
- Possible pedestrian and cyclist severance and delay.

Risk of Major Accidents and Disasters

- Consideration of UXO risk as part of contamination and ground conditions chapter.

5.1.5. In addition to the above technical assessments within the ES, the Medway Council Scoping Opinion requested consideration of greenhouse gas emissions associated with the development and their global warming potential, and aviation safety. Both of these topics are considered within Chapter 4 of this ES.

5.1.6. The full results of the assessments are presented within Volumes 1 and 2 of the EIA, and a summary is presented in Section 6 of this report.

5.1.7. Of the technical assessment chapters included within Chapters 6 to 11 of the ES, there has been additional assessment work undertaken on the following elements of the ES:

i. **Chapter 6: Natural Heritage and Ecology** as the assessment of pollutants from road traffic falling on areas that are protected under European ecological legislation is influenced by the updated work that has been undertaken on the Medway Council Strategic Transport Assessment Model;

ii. **Chapter 7: Traffic and Transport** as the predicted impact of traffic generated by IPM is influenced by the updated work that has been undertaken on the Medway Council Strategic Transport Assessment Model. Additional work has also been undertaken to develop the preliminary junction mitigation designs for the Bridgewood, Lord Lees and Taddington roundabouts;

iii. **Chapter 11: Landscape and Visual Impact** as consultation responses from Natural England and the Kent Downs AONB Unit requested further information on the predicted views of the Proposed Development from the designated area.

5.1.8. Updates and amendments have not been considered necessary for the technical chapter topics within in the ES for the reasons set out below:

- Chapter 8: Air quality – the basis for the assessment of road traffic emissions within Chapter 8 of the ES is different to that used within Chapter 6 of the ES for deposition on designated sites and does not rely on the Medway Council Strategic Transport Assessment Model. As such, the updated work on the model does not affect the assessment of air quality in Chapter 8 of the ES. As the projected trip generation for the Proposed Development has also not changed since the submission of the LDO application, the air quality assessment and the value of mitigation set out in Chapter 8 of the ES is considered to remain valid.
- Chapter 9: Contamination – there have been no changes to the proposed scale or layout of development within IPM since the submission of the LDO application and therefore the assessment presented within Chapter 9 of the ES is considered to remain valid.
- Chapter 10: Social and Economic – there have been no changes to the proposed scale or layout of development within IPM since the submission of the LDO application and therefore the assessment presented within Chapter 11 of the ES is considered to remain valid.

6.0 WHAT ARE THE LIKELY ENVIRONMENTAL IMPACTS AND HOW WILL THEY BE MINIMISED?

6.1. Air Quality

6.1.1. This assessment has been completed in order to determine whether the proposed development achieves compliance against the National Air Quality Objectives (NAQOs), along with National and Local Planning Policy. This assessment has been undertaken in accordance with the Department for Environment, Food and Rural Affairs' (DEFRA) current Technical Guidance on Local Air Quality Management (LAQM.TG16) and covers the effects of local air quality on the development.

6.1.2. The overall pollutant concentrations of nitrogen dioxide and particulates (PM_{10} and $PM_{2.5}$) are assessed at sensitive residential and ecological receptors in the near to the development.

6.1.3. The effects of dust nuisance without any mitigation would be temporary, short term, local in effect and of negligible to medium risk. In respect of dust impacts during construction (subject to best practicable means mitigation) the impacts at sensitive receptors will be reduced to a negligible effect.

6.1.4. The main source of potential air quality impacts from the development, (after taking into account standard mitigation measures that will be implemented during the construction and operational phases), will be its additional traffic generation onto the local road network.

6.1.5. During the operational phase, the modelling predicts that there will be negligible to small increases in nitrogen dioxide and particulate matter at nearby residential and ecological sensitive receptors as a result of the cumulative effects of the proposed development and

neighbouring development. Pollutant concentrations will remain significantly below the UK air quality objective levels and therefore, no specific mitigation is required.

6.1.6. Current Kent County Council and Medway Council guidance requires quantification of the 'air quality damage costs' as a result of impact of the development on the local Air Quality Management Areas. This is based on a comparison between predicted emissions associated with a development and guidance on costs that should be directed towards mitigation measures. For the proposed development, a total of £1,544,660 will need to be directed towards mitigation of air quality effects. This will be paid proportionally by future developers acting in accordance with the conditions attached to the LDOs.

6.2. Community, Social and Economic

6.2.1. Community, Social and Economic effects were assessed with reference to the Medway Travel to Work Area and employment statistics related to the local Rochester South and Horsted ward.

6.2.2. Economic activity in Medway is higher than the national average (77.7% vs 76.8%), with levels of 80.2% in the local ward. In terms of educational attainment, 14% of the local population have no qualifications (England and Wales average: 15%), with attainment rates of higher qualifications (NVQ Level 4/5) lower in Medway than across England and Wales (20.8% vs 29.7%). Local contrast is provided by Tonbridge and Malling, where 35.2% of the population hold higher qualifications.

6.2.3. Unemployment levels are generally lower in the area than nationally, with the majority of employment provided in health and social care, wholesale and retail trade, and education. Professional, scientific and technical employment (3.3%) lags someway behind England and Wales as a whole (8.7%).

6.2.4. The Index of Multiple Deprivation shows the ward to be in the 30% least deprived neighbourhoods, but areas adjacent to Medway are in the most deprived 10%.

6.2.5. The local economy and the local community are sensitive receptors considered to be of medium sensitivity.

6.2.6. During construction, 21 jobs (based on the Full Time Equivalent - FTE) are expected to be created within the ward, 410 jobs within a wider 'Travel to Work Area', and 756 jobs in the south-east region.

6.2.7. During operation of the proposed development, estimated FTE's are 88 jobs in the local ward, 1,426 jobs in the Travel to Work Area, and 3,292 jobs in the south-east region.

6.2.8. As a result of the proposals, it is expected that impacts on employment and community will be positive and significant.

6.3. Ground Conditions

6.3.1. The site is currently used as part of Rochester Airport but over its development history, it has been used for a range of military and commercial land uses that present the potential for contamination to be present within soils and / or water and gas in the ground. Construction of the proposed development will potentially bring construction workers into contact with any contamination present on the site and construction activities such as piling has the potential to allow contaminants such as oils to be transferred to sensitive receptors such as underlying groundwater. Once the development is occupied, the commercial / employment nature of the

buildings on the site are such that it is unlikely that people working on the site would have potential to come into contact with any contamination present.

6.3.2. A Ground Investigation (GI) was undertaken during March and April 2019 to determine the potential for contamination to be present on the site. The GI covered the whole site and included a combination of mechanically-excavated 'trial pits' and boreholes. Samples were taken of soils and ground gas, which were analysed in a laboratory. No groundwater was encountered during the GI and hence no analysis of groundwater was required.

6.3.3. The test results confirmed that there were no significant concentrations of contaminants recorded within soil samples across the site and that ground gas concentrations were within levels where no gas protection measures would be required.

6.3.4. A desk-based assessment for the potential for Unexploded Ordnance (UXO) has taken account of the history of site use and records of bombing raids during the Second World War. The site is considered to present potential for German air-dropped weapons (e.g. bombs and shells) to be present, and also for shells associated with British Anti-Aircraft activities during the Second World War to be present on the site.

6.3.5. The construction of the proposed development has potential for contaminants (e.g. oils and fuels) associated with construction vehicles to cause contamination. The likely quantities of such spills and leaks will be small and it is likely that these would be localised. Through the application of best-practice construction practices regarding the storage of materials, the refuelling and maintenance of vehicles and measures to be taken in the event of spills and leaks, there would be no significant contamination effects during the construction phase.

6.3.6. The nature of the proposed development (i.e. predominantly office and research and development / high tech uses) is such that the potential for significant contamination is considered to be low. The proposed approach to management of surface water runoff from buildings, roads and car parking areas on the site will ensure that any pollutants in runoff can be appropriately managed prior to this water being returned to the ground. No significant effects are therefore predicted to ground or groundwater once the development is occupied and operational.

6.3.7. Construction of the proposed buildings and other infrastructure on the site has the potential to encounter UXO and therefore, detailed risk assessments will be undertaken as each area of the site is developed and where necessary, UXO Risk Mitigation Strategies will be prepared and implemented.

6.4. Landscape and Visual

6.4.1. The site is located on a plateau of high ground within an urban area, beyond which to the west and south is a wooded ridge that constitutes part of the Kent Downs Area of Outstanding Natural Beauty (AONB). The AONB is separated from the urban area and the site by a steep valley within which runs the M2 motorway. To the north and east, the urban area extends across an undulating landscape with valleys that descend towards the River Medway.

6.4.2. The two areas of land (north and south) that constitute the site fall within an area of townscape characterised by Rochester Airport and its surroundings. This area of townscape is distinct from the residential areas to the north, east and south. The Rochester Airport character area comprises an open airfield and buildings of a larger grain and scale than the surrounding urban area.

6.4.3. Parcel 1, within the northern area, is part of the wider airfield to the east. Parcel 2 is similar in character to numerous areas of hardstanding within the commercial areas surrounding the airfield. The northern area is open in character, which contrasts with the more enclosed and wooded character of the southern site. Parcel 3 of the southern site is an area of brownfield land and Parcel 4 is a caravan park surrounded by a dense tree belt. The area immediately to the south and east of the southern site is predominantly characterised by residential development, with occasional larger scale commercial uses, such as the ASDA to the east of the A229.

Impacts on local landscape character

6.4.4. Effects would be localised, largely contained to within the Nashenden Valley landscape character area, which broadly coincides with the Nashenden Down Nature Reserve. The character of the landscape within this area is influenced by rail and road infrastructure, by buildings within the Rochester Airport employment area and development further north along the scarp (for example the buildings associated with HM Prison Rochester, HM Prison Cookham Wood and Royal Mail).

Impacts on wider landscape character

6.4.5. The visibility of the proposals is limited and only extends across a small area of the AONB. Given the AONB covers a broad area, and where effects occur to a localised area they would only be Slight significance, effects on the landscape character of the AONB and land adjacent to the AONB as a whole would be Minimal significance

Impacts on quality of views out of the AONB

6.4.6. Localised effects are identified approximately 500m to the north-west of the site, where views of the proposals would appear above the treeline along the scarp slope that defines the boundary between the AONB and the urban area to the east. From this part of the AONB, views looking out towards the top of the scarp would be affected, but this would be from a localised area, comprising a small extent of wider views and would be in the context of existing development along the scarp around Rochester Airport and further north.

Impacts on the quality of views into the AONB

6.4.7. Views into the AONB from the urban area to the east of the site area limited, where views towards the AONB are glimpsed or seen across buildings within the urban area, as demonstrated by viewpoints 1, 2, 3, 4 and 5 appended to this assessment. The proposals would obscure some views towards the AONB but effects would be for localised areas and in most instances barely perceptible.

Impacts on Tranquillity and Remoteness

6.4.8. The site and the AONB within the study area are in an area of relatively low tranquillity, influenced by the M2, High Speed Rail infrastructure and existing development at the edge of the urban area. The only effects on relative tranquillity would be the introduction of small areas of new built development seen on the skyline, seen in the context of existing development (including some potential additional lighting which would be controlled through the LDO), from limited and localised parts of the AONB, and there would be no changes to noise or air quality. Relative tranquillity would not be fundamentally changed by the proposals.

Impacts on the AONB in terms of Biodiversity, Farmed landscape, Woodland and trees, Historic and Cultural Heritage and Geology and Natural resources

6.4.9. These elements of the AONB will not be affected by the proposals.

6.5. Natural Heritage and Ecology

6.5.1. The focus of the Natural Heritage and Ecological assessment is on the likely impact of nitrogen emissions from road traffic associated with the proposed development on the North Downs Woodland Special Area of Conservation (SAC) / Wouldham to Detling Escarpment Site of Special Scientific Interest (SSSI). These are protected areas of ecological habitat at European and national levels respectively.

6.5.2. Guidance on the effect of emissions from road traffic on protected habitats has been provided by Natural England and reflects that emissions should be considered where habitats are within 200 metres of roads. Further guidance is based on a previous court judgement on a proposed development in West Sussex, which established thresholds of 1,000 cars per day and 200 Heavy Goods Vehicles per day as levels of change below which effects associated with traffic emissions would not be significant.

6.5.3. The assessment undertaken has confirmed that the proposed development (with or without the highways mitigation proposed) would not increase traffic flows on roads within 200 metres of the SAC / SSSI above the thresholds likely to trigger impacts related to nitrogen deposition. Therefore there will be no adverse impact on these ecological assets associated with the proposed development.

6.5.4. The assessment has also taken account of the likely cumulative effect of the proposed development in combination with other projected future development within Medway and the adjacent local authority areas (Tonbridge and Malling, Maidstone, Swale and Gravesham) over the local plan period to 2037. This assessment has concluded that although there will be an increase in road traffic from all proposed development within the local plan period, the effect of improvements in vehicle emissions technology (including the increased use of electric and hybrid vehicles) will result in reduced overall nitrogen deposition compared to the current situation. As such, no significant cumulative or in-combination effects are predicted.

6.6. Traffic and Transport

6.6.1. Effects are assessed for three development scenarios: baseline assessment, construction assessment and future year with development assessment.

6.6.2. The site is currently accessible by modes of transport other than the private car, however the B2097 does not have pedestrian footways. Public transport provision in the vicinity of the Site is relatively good with bus stops within walking distance of the Site.

6.6.3. The potential environmental impacts of the car and non-car traffic during the construction and operation phase of the Proposed Development has looked at the sensitivity of local road links and junctions and the magnitude of the effects expected. The assessment has made use of Department for Transport data and traffic modelling undertaken by Fore Consulting Limited to understand the impact of the Proposed Development traffic.

6.6.4. The impacts of construction traffic on traffic flows, congestion and delays are considered to be low. Construction traffic will be constrained to defined routes. The effects will be temporary and only occur over the duration of the construction phase.

6.6.5. During operation the movement strategy for the Proposed Development seeks to maximise pedestrian and cycle permeability. The significance of impact on pedestrians and cyclists is assessed as being moderate to major beneficial. The Site layout allows for bus routes to serve the Proposed Development. The significance of impact on the public transport network is assessed to be moderate beneficial.

6.6.6. The traffic change on key roads falls below thresholds of significance. However, due to the existing congested network, without mitigation, the addition of the Proposed Development traffic is likely to increase queuing and delay on links and junctions which currently experience congestion.

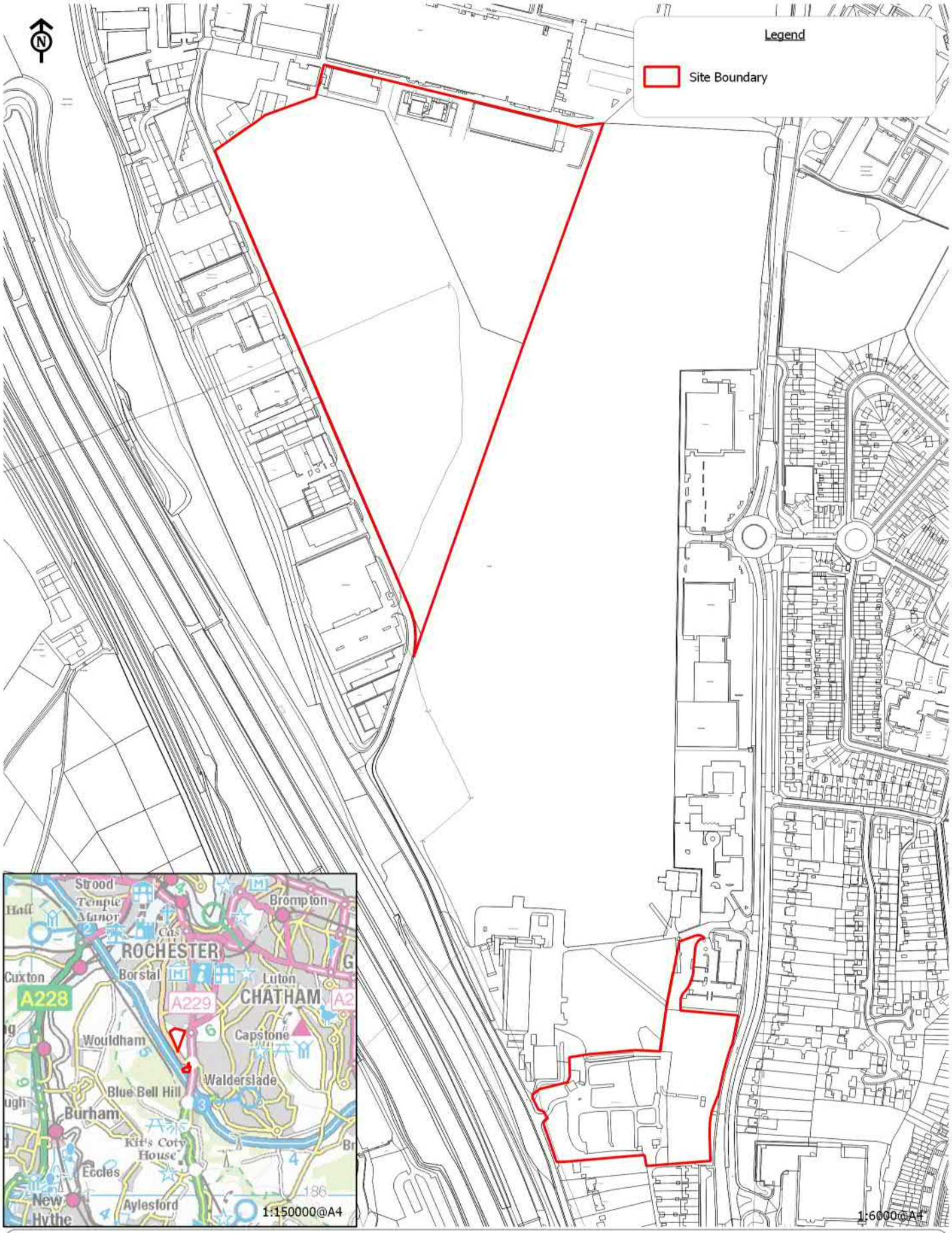
6.6.7. Mitigation measures such as the implementation of a Construction Environmental Management Plan will be prepared in order to minimise any environmental impact during the construction period. Other mitigation measures include encouraging use of sustainable modes of transport in particular walking and cycling as part of the Travel Plan.

6.7. A number of highway mitigation measures are proposed as part of the Fore Consultants Limited modelling exercise, including improvements to the Bridgewood, Lord Lees and Taddington roundabouts and improvements at Junction 4 on the M2. The proposed junction improvements have been subject to preliminary design and a Stage 1 Road Safety Audit. With the proposed mitigation in place, there will be a significant reduction in delay and queuing on most approaches at Lord Lees roundabout, Taddington roundabout and Bridgewood roundabout. In addition to the analysis of queuing and delay at each of these junctions, an assessment of journey time has been undertaken for key routes. This shows that with the proposed mitigation in place the majority of routes would experience reductions in journey time.

6.8. Cumulative and In-combination effects

6.8.1. The assessment has where possible considered cumulative and in-combination effects. These are based on the effect of increases of traffic as a result of the development of the site. Traffic data used has made allowance for traffic growth as a result of development additional to the development proposals. No significant cumulative or in-combination effects are predicted.

Figures



Innovation Park, Medway

Client: Medway Council

NTS - 1:
Site Location and LDO Boundary

Scale:	1:6000, 1:150000 @A4
CampbellReith OS Copyright:	© Crown copyright. All rights reserved. Licence number 100020027
Contains Ordnance Survey data	© Crown copyright and database right 2019.
Job Number:	12841
Drawn by - Checked by:	RP - SB
Drg No - Status/Revision:	GIS031 - A
File location:	N:/12750 - 12999/12841 R - Medway/Project_Workspaces/NTS (pdf in Outputs)
Date (Revision History):	24/01/2019 (A, First Issue, 24/01/19, RP)

CampbellReith
consulting engineers
LONDON 020 7340 1700 ☐ ☐ MANCHESTER 0161 819 3060
REDHILL 01737 784 500 ☒ ☐ BIRMINGHAM 01675 467 484
BRISTOL 0117 916 1066 ☐ ☐ DUBAI 00 971 4453 4735
www.campbellreith.com

1:5000@A3

LEGEND

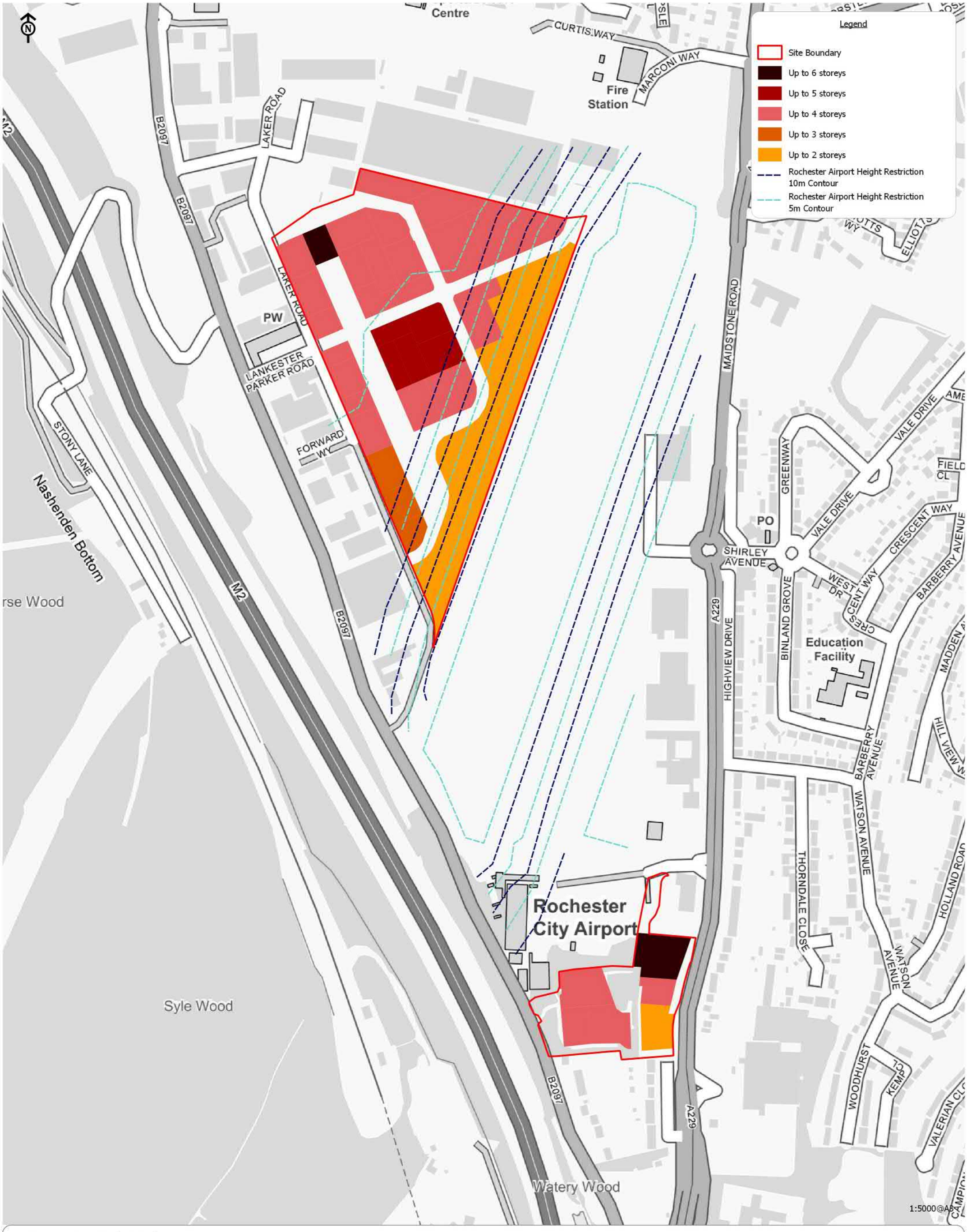
Innovation Park, Medway

Client: Medway Council

NTS - 2:
IPM Proposed Masterplan

Scale: 1:5000@A3
CampbellReith OS Copyright: © Crown copyright. All rights reserved. Licence number 100020027
LDA Design Illustrative Masterplan, drg no 6278_MP_002 (July 2018)
Job Number: 12841
Drawn by - Checked by: RP - SMG
Drg No - Status/Revision: GIS032 - A
File location: N:/12750 - 12999/12841 R - Medway/Project_Workspaces/NTS (pdf in Outputs)
Date (Revision History): 24/01/2019 (A, First Issue, 24/01/19, RP)

CampbellReith
consulting engineers
LONDON 020 7340 1700 ☐ ☐ MANCHESTER 0161 819 3060
REDHILL 01737 784 500 ☒ ☐ BIRMINGHAM 01675 467 484
BRISTOL 0117 916 1066 ☐ ☐ DUBAI 00 971 4453 4735
www.campbellreith.com



Innovation Park, Medway

Client: Medway Council

NTS - 3:
Building Heights Parameter Plan

Scale: 1:5000@A3
CampbellReith OS Copyright: © Crown copyright. All rights reserved. Licence number 100020027
Contains Ordnance Survey data © Crown copyright and database right 2019.
Job Number: 12841
Drawn by - Checked by: RP - SMG
Drg No - Status/Revision: GIS033 - A
File location: N:/12750 - 12999/12841 R - Medway/Project_Workspaces/NTS (pdf in Outputs)
Date (Revision History): 24/01/2019 (A, First Issue, 24/01/19, RP)

CampbellReith
consulting engineers
LONDON 020 7340 1700 ☐ ☐ MANCHESTER 0161 819 3060
REDHILL 01737 784 500 ☒ ☐ BIRMINGHAM 01675 467 484
BRISTOL 0117 916 1066 ☐ ☐ DUBAI 00 971 4453 4735
www.campbellreith.com

Innovation Park, Medway

Client: Medway Council

NTS - 4:
Access Parameter Plan

Scale:	1:5000@A3
CampbellReith OS Copyright:	© Crown copyright. All rights reserved. Licence number 100020027
Contains Ordnance Survey data	© Crown copyright and database right 2019.
Job Number:	12841
Drawn by - Checked by:	RP - SMG
Drg No - Status/Revision:	GIS034 - A
File location:	N:/12750 - 12999/12841 R - Medway/Project_Workspaces/NTS (pdf in Outputs)
Date (Revision History):	24/01/2019 (A, First Issue, 24/01/19, RP)

CampbellReith
consulting engineers
LONDON 020 7340 1700 ☐ ☐ MANCHESTER 0161 819 3060
REDHILL 01737 784 500 ☒ ☐ BIRMINGHAM 01675 467 484
BRISTOL 0117 916 1066 ☐ ☐ DUBAI 00 971 4453 4735
www.campbellreith.com

Innovation Park, Medway

Client: Medway Council

NTS - 5:
Landscape Parameter Plan

Scale:	1:5000@A3
CampbellReith OS Copyright:	© Crown copyright. All rights reserved. Licence number 100020027
Contains Ordnance Survey data	© Crown copyright and database right 2019.
Job Number:	12841
Drawn by - Checked by:	RP - SMG
Drg No - Status/Revision:	GIS035 - A
File location:	N:/12750 - 12999/12841 R - Medway/Project_Workspaces/NTS (pdf in Outputs)
Date (Revision History):	24/01/2019 (A, First Issue, 24/01/19, RP)

CampbellReith
consulting engineers
LONDON 020 7340 1700 ☐ ☐ MANCHESTER 0161 819 3060
REDHILL 01737 784 500 ☒ ☐ BIRMINGHAM 01675 467 484
BRISTOL 0117 916 1066 ☐ ☐ DUBAI 00 971 4453 4735
www.campbellreith.com

London

15 Bermondsey Square
London
SE1 3UN

T: +44 (0)20 7340 1700
E: london@campbellreith.com

Birmingham

Chantry House
High Street, Coleshill
Birmingham B46 3BP

T: +44 (0)1675 467 484
E: birmingham@campbellreith.com

Surrey

Raven House
29 Linkfield Lane, Redhill
Surrey RH1 1SS

T: +44 (0)1737 784 500
E: surrey@campbellreith.com

Manchester

No. 1 Marsden Street
Manchester
M2 1HW

T: +44 (0)161 819 3060
E: manchester@campbellreith.com

Bristol

Wessex House
Pixash Lane, Keynsham
Bristol BS31 1TP

T: +44 (0)117 916 1066
E: bristol@campbellreith.com

CampbellReith
consulting engineers

Innovation Park Medway

Environmental Statement Addendum

For

INNOVATION PARK MEDWAY

Project Number:

12841

October 2020

Campbell Reith Hill LLP
Raven House
29 Linkfield Lane
Redhill
Surrey RH1 1SS

T:+44 (0)1737 784500
F:+44 (0)1737 784501
E:surrey@campbellreith.com
W:www.campbellreith.com

Document History and Status

Revision	Date	Purpose/Status	File Ref	Author	Check	Review
D1	07.10.20	Draft for client comment	ES_Addendum_Summaryv1.doc	DS	SRB	SRB
F1	21.10.20	Issue for consultation	ES_Addendum_Summaryv2.doc	DS	SRB	SRB

Document Details

Last saved	21/10/2020 17:24
Path	ES_Addendumv2.docx
Author	David Smith
Project Partner	David Smith
Project Number	12841
Project Name	Innovation Park Medway

Contents

Appendices

1.0 INTRODUCTION

1.1. Background

1.1.1. Medway Council (MC) and Tonbridge and Malling Borough Council (TMBC) (herein jointly referred to as the 'Applicant'), submitted an application for a Local Development Order (LDO) in June 2019 on land adjacent to Rochester Airport (MC/19/1556). The Proposed Development is referred to as Innovation Park Medway (IPM).

1.1.2. The LDO application was supported by a range of technical assessments including an Environmental Statement (ES), which presents the findings of an Environmental Impact Assessment (EIA) of the Proposed Development.

1.1.3. The LDO proposes a total of 101,000 sqm of predominantly high-tech and innovation oriented B1 (now Class E(g)) and B2 business and employment uses. The design of IPM is described within Chapter 4 of the ES submitted as part of the LDO application and will involve the following:

- A runway park – providing a clear identity and provide high quality open space, whilst reflecting on the site's aviation history;
- Iconic Buildings – the masterplan includes two 'book-ends' along linear alignment diagonally through the site which aims to link the two development areas;
- Pedestrian friendly clusters – car parks located in strategic locations allowing free-flowing pedestrian movements and pedestrian clusters to form in the key open spaces, and a pedestrian link between the two development areas;
- Landscape character areas – consisting of orchard planting, open lawn spaces, meadows, woodland clusters/woodland walk, park edge plots, a boulevard, and outdoor collaboration spaces proposed through using innovative technology design in the landscape;
- Primary gateway spine – a key feature will include the distribution of B1 business employment spaces along this gateway spine to promote active frontages onto key routes;
- Drainage design – a surface water drainage scheme based upon a range of infiltration techniques and will be employed through the use of swales, open storage structures along landscaped green corridors.

1.1.4. Since the submission of the LDO application, there has been ongoing consultation and this Addendum to the ES has been prepared as part of further statutory consultation on the Proposed Development prior to the application being determined by the Planning Authority.

1.1.5. There have been no changes to the LDO boundary, the scale or nature of the Proposed Development set out within the original LDO application and Chapter 4 of the ES, other than for the proposed land use classes to be updated in accordance with the Town and Country Planning (Use Classes) (Amendment) (England) Regulations 2020, which came into force on 1st September 2020. Whereas the original LDO application proposed development in use classes B1 (a, b and c) and B2, the Proposed Development is now in the following use classes:

- Use Class E(g)(i) - Business (office)
- Use Class E(g)(ii) - Research and development of products and processes

- Use Class E(g)(iii) - Industrial processes; and
- Use Class B2 - General Industrial.

1.1.6. Whilst the descriptions of use classes has been updated, the nature of the Proposed Development and character of likely environmental impacts remains consistent with the original LDO application.

1.1.7. There has been no formal request for 'further information' on the ES under Regulation 25 of the Town and Country Planning (Environmental Impact Assessment) Regulations 2017.

1.1.8. Subsequent to the submission of the LDO application and receipt of consultations responses, engagement has continued with the LPA, Kent County Council (as highway authority), Highways England, Natural England, the Kent AONB Unit and a range of other consultees. The result of the ongoing consultation is that assessment updates have been undertaken in the following topic areas:

- Update to the Medway Council Strategic Transport Assessment (STA) model, which provides the background traffic context to the Transport Assessment and Ecological Assessment submitted as part of the ES within the LDO application;
- Preparation of preliminary junction mitigation designs for the Bridgewood, Lord Lees and Taddington roundabouts;
- The views of IPM from the Kent Downs Area of Outstanding Natural Beauty (AONB).

1.1.9. In addition, there has been ongoing consultation with Natural England regarding its comments during the initial consultation period on whether the IPM development would have any effect on aviation movements across the AONB, and whether this would have a significant effect on the tranquillity of the designated area.

1.2. Purpose of this document

1.2.1. The purpose of this document is to explain the additional and updated assessment work that has been undertaken and how this relates to the assessments submitted within the ES. Where there are changes to the likely significant effects set out in the original ES, these will be clearly identified but this Addendum forms part of the original EIA. It should therefore be read in conjunction with the original ES. Further explanation of the structure of the Addendum and how it relates to the original ES is provided within section 2 of this report.

1.3. Availability of the Environmental Statement Addendum

1.3.1. This ES Addendum has been submitted during the COVID-19 pandemic and whereas it would normally be available for public viewing during normal office hours at the Medway Council offices, this is unlikely to be possible during the consultation period due to the need for social distancing. The full Addendum and copies of the original LDO application are available for inspection on the Planning Registers for Medway Council (application reference number MC/19/1556) and Tonbridge and Malling Council (application reference number 19/01409/FUL):

- Medway Council Planning Register: www.publicaccess1.medway.gov.uk/online-applications/
- Tonbridge and Malling Council Planning Register: www.publicaccess2.tmbc.gov.uk/online-applications/

1.3.2. The ES Addendum may be purchased as a hard copy in volumes, the costs for which are set out below:

- Non-Technical Summary (NTS) – £15.00
- ES Addendum and Appendices - £75.00
- Full copy (NTS and Addendum) on DVD - £25.00

1.3.3. For copies of any of the above please contact Lucy Carpenter at Medway Council (lucy.carpenter@medway.gov.uk).

1.4. Alternative formats

1.4.1. A large text version of this document is available upon request. Please note that printing costs may vary from those stated above.

2.0 METHODOLOGY

2.1. General approach to the preparation of the ES Addendum

2.1.1. The nature of the additional work undertaken since the submission of the original LDO application, (as summarised in section 1.0 of this Addendum) fall within one of two themes:

i. Changes to the background network traffic context resulting from the ongoing development of the Medway Council Strategic Transport Assessment Model

ii. Further information provided in response to comments raised by Statutory Consultees following submission of the LDO application

2.1.2. Of the technical assessment chapters included within Chapters 6 to 11 of the ES, there has been additional assessment work undertaken on the following elements of the ES:

i. **Chapter 6: Natural Heritage and Ecology** as the assessment of nitrogen deposition on designated sites from road traffic is influenced by the updated work that has been undertaken on the Medway Council Strategic Transport Assessment Model;

ii. **Chapter 7: Traffic and Transport** as the predicted impact of traffic generated by IPM is influenced by the updated work that has been undertaken on the Medway Council Strategic Transport Assessment Model. Additional work has also been undertaken to develop the preliminary junction mitigation designs for the Bridgewood, Lord Lees and Taddington roundabouts;

iii. **Chapter 11: Landscape and Visual Impact** as consultation responses from Natural England and the Kent Downs AONB Unit requested further information on the predicted views of the Proposed Development from the designated area.

2.1.3. Updates and amendments have not been considered necessary for the technical chapter topics within in the ES for the reasons set out below:

- Chapter 8: Air quality – the basis for the assessment of road traffic emissions within Chapter 8 of the ES is different to that used within Chapter 6 of the ES for deposition on designated sites and does not rely on the Medway Council Strategic Transport Assessment Model. As such, the updated work on the model does not affect the assessment of air quality in Chapter 8 of the ES. As the projected trip generation for the Proposed Development has also not changed since the submission of the LDO application, the air quality assessment and the value of mitigation set out in Chapter 8 of the ES is considered to remain valid;
- Chapter 9: Contamination – there have been no changes to the proposed scale or layout of development within IPM since the submission of the LDO application and therefore the assessment presented within Chapter 9 of the ES is considered to remain valid.
- Chapter 10: Social and Economic – there have been no changes to the proposed scale or layout of development within IPM since the submission of the LDO application and therefore the assessment presented within Chapter 11 of the ES is considered to remain valid.

2.1.4. The review and update to the relevant technical assessments has been undertaken in one of two ways depending on the nature of the chapter and the extent / nature of updated or additional assessment required. This ES Addendum has been prepared by the original authors of the ES submitted as part of the planning application.

2.1.5. For topics where the amendments to the chapter are predominantly numerical and where it could be complicated to describe each of the changes in a separate addendum section (such as Natural Heritage or Traffic and Transport), complete replacement ES chapters have been re-submitted, with key changes highlighted in a blue font (reflecting when changes have been made to the original chapter) for clarity. The intention is that these chapters should be read holistically, without the need to cross-reference to the previous version of the chapter. The use of coloured font to identify where new text or figures have been added is to assist ease of identification for those consultees that have already read the previously submitted ES chapters.

2.1.6. For Landscape and Visual, the nature of the additional assessment is more suited to a stand-alone addendum section rather than re-submission of the whole ES chapter because there have been no changes required to the information and technical assessment previously submitted. In this case, the ES chapter submitted with the original LDO application is retained in its entirety and the additional information on Landscape and Visual Assessment provided within this Addendum, including winter views, should be read in conjunction with the ES chapter.

2.1.7. Section 3.0 of this Addendum provides a summary of the updates to the technical assessments.

2.2. Summary of mitigation measures and residual effects

2.2.1. An updated version of the mitigation summary table and residual effects table from Chapter 12 of the ES has been included within section 4.0 of this Addendum. This replaces Chapter 12 of the ES.

2.3. Non-technical summary

2.3.1. The non-technical summary has been updated and has been re-submitted as a whole document to reflect the context to the ES Addendum and any resultant changes to the significant impacts of the Proposed Development. Amended sections are in a blue font, as described above, so that these are easy to identify.

3.0 REVIEW AND UPDATE OF TECHNICAL ASSESSMENTS IN THE ES

3.1. Introduction

3.1.1. This section of the Addendum outlines the review and update of the three relevant technical assessments. Where the respective ES chapters have been updated holistically, or where there is specific additional new assessment for the Addendum (which will supplement that already included within the ES), these are provided as appendices to this Addendum, and referred to in the respective sections below. A further section is also provided in response to consultation comments on noise and tranquillity.

3.2. Natural Heritage and Ecology

3.2.1. The principal consultation response from Natural England with respect to the assessment of road traffic emissions on designated sites set out within Chapter 6 of the ES was the requirement to undertake a cumulative and in-combination assessment for vehicle emissions on the North Downs Woodland Special Area of Conservation (SAC), which has sections within 200 metres of the A229 Bluebell Hill and A249 Detling Hill.

3.2.2. The updated work that has been undertaken on the Medway Council Strategic Transport Assessment model since the submission of the LDO application has potential to affect the cumulative and in-combination effect of the Proposed Development with projected future development within Medway and adjacent local authority areas. The original assessment set out in Chapter 6 of the ES has therefore been reviewed and updated based on the most recent outputs from the Medway Council Strategic Transport Assessment model.

3.2.3. An updated ES chapter has been provided as Appendix A to this Addendum and this replaces completely the original version of Chapter 6.

Confirmation that the Medway Council Strategic Assessment Model provides a robust basis for cumulative and in-combination effects

3.2.4. Prior to the update of the assessment of ES Chapter 6, information was provided to Natural England in August 2020 to explain how the existing Medway Council Strategic Transport Assessment model has taken account of forecast traffic growth from neighbouring local authority areas.

3.2.5. The Applicant confirmed to Natural England that the model takes a robust approach to the predicted future influence of development traffic from adjacent local authority areas in relation to adopted / emerging local plans. It uses a combination of National (for Tonbridge & Malling, Gravesham and Maidstone) or local (for Swale) growth projections to ensure that the included traffic flows are either consistent with or above the respective Local Plan household growth predictions. The use of local growth factors for Swale was because the National growth projections for this authority were substantially lower than the Local Plan, as shown in **Table 3.1**. The model has therefore adopted local growth for Swale and this approach has been agreed with Highways England.

Table 3.1: Comparison of National Trip End Model (NTEM) and Adopted / Emerging Local Plan Growth Local Authority

	Household Growth (2016 to 2035)		
	NTEM	**Adopted / Emerging Local Plan**	**NTEM compared to Local Plans**
Gravesham	8,056	6,897	+16.8%
Maidstone	17,010	16,777	+1.4%
Swale	8,442	14,744	- 43%
Tonbridge & Malling	12,052	8,075	+ 49%
Total	**45,560**	**46,493**	**-2.1%**

3.2.6. Table 3.1 shows that the NTEM projections for Gravesham and Maidstone are slightly above, but similar to, those set out in the Adopted / Emerging Local Plans. However, for Swale and Tonbridge & Malling the growth in households is underestimated and overestimated respectively. When considered cumulatively, the level of growth assumed in NTEM, and therefore in the model, is broadly similar to that set out in the Adopted / Emerging Local Plans, with a difference of just 2% overall.

3.2.7. This information confirms that, in using the NTEM projections, the Strategic Transport Assessment Model has taken a robust approach to the assessment of cumulative and in-combination traffic growth that is consistent overall with the projected growth in households within adjacent local authorities over the period to 2035. The variance between the Swale projected growth and the growth that was initially built into the model using NTEM could have been an influential factor in the traffic flows along the A249 for movements between Swale and Maidstone. This variance has been discussed with Highways England when the model was being prepared it was updated to reflect the higher projected Swale Local Plan growth figures. Highways England has confirmed its acceptance of this approach.

3.2.8. On this basis, the use of current and projected future traffic flows within the Medway Strategic Transport Assessment model for the A229 and A249 will provide a robust basis for the assessment of cumulative and in-combination effects of the IPM traffic flows on the SAC because it includes projected Local Plan growth from relevant adjacent local authority areas in addition to projected traffic growth within Medway.

Summary of the updated assessment

3.2.9. The updated Chapter 6 assessment is presented within **Appendix A** to this Addendum.

3.2.10. Additional published information has been provided on the known baseline to nitrogen deposition within the designated areas that are within 200 metres of the A229 and A249. Published data suggests that existing nitrogen deposition on the SAC woodlands is in excess of the relevant critical loads and that existing nitrogen deposition on the SAC grassland habitats is marginally above the respective critical load.

3.2.11. Guidance provided by Natural England through case law has advised that '*an expected increase in traffic (Annual Average Daily Traffic ("AADT") flows) of less than 1,000 cars per day or 200 HGVs per day*', would have no likely significant effect on a SAC and no appropriate assessment would be required. Predicted traffic flow data for the A229 and A249 adjacent to the designated areas has been set out in the updated ES chapter for three scenarios.

- 2037 Do-minimum – background traffic and committed development (including projected growth in traffic from adjacent local authority areas) in the absence of IPM
- 2037 Do-something – background traffic, committed development (including projected growth in traffic from adjacent local authority areas) and IPM traffic
- 2037 Do-something plus mitigation – background traffic, committed development (including projected growth in traffic from adjacent local authority areas), IPM traffic and the effect of altered traffic distribution resulting from proposed highways mitigation measures associated with IPM (Bridgewood Roundabout, Lord Lees Roundabout, Taddington Roundabout and Junction 4 of the M2).

3.2.12. The results of the modelling therefore show predicted AADT movements for both roads (with or without mitigation) to be below the Natural England thresholds (1,000 total/200 HGV), indicating that significant effects from nitrogen deposition on the North Downs Woodlands SAC and Wouldham to Detling Escarpment SSSI from IPM alone would be unlikely to make a significant contribution to nitrogen deposition on the SAC or the SSSI.

3.2.13. With respect to cumulative and in-combination effects of IPM with other development in Medway and adjacent authorities, modelled traffic flows suggest that the baseline nitrogen deposition rates across the SAC will continue to exceed the applicable minimum critical load values, although background nitrogen deposition is predicted to reduce over the plan period due to improvements in vehicle emissions over time as a higher proportion of newer vehicles will be meeting more stringent emission standards and there is an increased uptake of electric or hybrid vehicles.

3.2.14. Whilst the additional nitrogen deposition associated with cumulative and in-combination effects will marginally counter/offset the predicted significant background improvements from the base year to the future year, the resultant total nitrogen deposition across the SAC is still predicted to be significantly below the current baseline values. Considering the above, it is not considered that the predicted levels of cumulative and in-combination nitrogen deposition will have a perceptible impact upon the habitats within the affected areas of North Downs Woodland SAC. Therefore, it is considered that the integrity of North Downs Woodlands SAC will be maintained.

3.2.15. Whilst the assessment set out in Chapter 6 of the ES has been updated, the conclusion of no significant effect remains as set out in the original chapter.

3.3. Traffic and Transportation

3.3.1. Chapter 7 of the ES (Traffic and Transportation) has been reviewed and an updated version of the chapter is provided as **Appendix B** to this ES Addendum. It is intended that this completely replaces the chapter submitted as part of the original ES and LDO application. An updated version of the Transport Assessment (TA) has also been submitted as **Appendix C** to this ES Addendum.

3.3.2. The scale and nature of the Proposed Development have not been amended since the original submission of the LDO application and the basis of assessment and projected trip generation have not been amended. The updated ES chapter and TA both reflect that additional consultation has been undertaken with Highways England regarding the proposed approach to trip generation set out within the TA and that the conclusion of this consultation was that the proposed trip rates used in the TA are acceptable. These have been integrated within the updated STA modelling work.

3.3.3. The principal additional information included within the updated ES chapter and TA is with respect to the preliminary mitigation design work that has been undertaken since the submission of the LDO application on junctions that modelling has shown would be adversely affected by the addition of traffic associated with the operational phase of IPM. These layouts are included as Appendices D-F of this ES Addendum and have been submitted for a Stage 1 Road Safety Audit. The comments received from the Road Safety Audit will be integrated at the next stage of detailed design.

3.3.4. The outputs of the STA model have confirmed that the proposed mitigation will be necessary. The design of the mitigation will be subject to final surveys and agreement on delivery (to be led by Medway Council). If further survey demonstrates that mitigation is not deliverable then an alternative will be sought.

3.3.5. With the proposed mitigation in place, the updated ES chapter confirms that there would be a significant reduction in the predicted delay and queuing on most approaches at the Bridgewood, Lord Lees and Taddington roundabouts.

3.3.6. There has been no change to the predicted significance of impacts compared to the original ES chapter.

3.4. Landscape and visual assessment

3.4.1. As noted earlier in this document, there has been no requirement to update or revise the original Landscape and Visual Impact Assessment (LVIA) presented within Chapter 11 of the ES and the information described below should be read in addition to the LVIA.

3.4.2. Following consultation on the LDO and Design Code, additional material has been prepared in response to consultee requests for further information regarding visual impact of the proposed development on the AONB. Several documents have been prepared as follows:

Supplementary material to support the LVIA

3.4.3. **LVIA Addendum - December 2019 (Appendix G to this Addendum)** – this 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 ES.

3.4.4. **Winter Views – March 2020 (Appendix H to this Addendum)** - in February 2020, a site visit was undertaken to capture views from the AONB during winter months. The supplementary note contains photo panels and visualisations.

Additional information incorporated into the Design Code

3.4.5. **AONB Section – September 2020 (Appendix I to this Addendum) -** in addition to supplementary material supporting the LVIA, a standalone AONB section has been incorporated into the Design Code, providing more guidance on measures to further reduce impacts on the AONB, an approach that was agreed with Natural England and the AONB Unit.

3.4.6. **Environmental Colour Assessment – September 2020 (Appendix J to this Addendum) -** to gain a greater depth of contextual understanding, an Environmental Colour Assessment was commissioned to inform a set of design principles on the use of colour, specific to this location within the AONB. The AONB section of the Design Code summarises the findings of the study,

and the full report is appended to the Design Code, which should be read alongside the Kent Downs AONB "*Guidance on the Selection and Use of Colour in Development*".

3.4.7. The additional information presented within Appendices G to J of this Addendum do not change any of the ES conclusions with respect to the significance of impacts.

3.5. Noise and tranquillity

Context

3.5.1. As part of its response to the consultation on the LDO application, Natural England requested further information on the effect of the LDO on the pattern of aircraft movements at Rochester Airport and the potential for any such changes to have an adverse effect on the tranquillity of the Kent Downs AONB. The relevant excerpt from the Natural England consultation response dated 14th July 2020 is provided below:

With regards to tranquillity, the information provided in support of the application confirms that runway 16/34 will be closed to facilitate the Innovation Park development with all flights switching to runway 02/20. The Noise and Vibration Assessment (dated September 2018) discounts the potential for any noise impacts for receptors within the AONB on the basis of existing noise levels.

Chapter 5 states that 'Due to the high noise levels in this area of the AONB as a result of road traffic railway movements and aircraft, it is not anticipated that noise from the construction or operation of the development will significantly impact the AONB'. We note that no baseline noise monitoring locations appear to have been situated within the AONB and the CadnaA noise model on which the conclusion of no significant impact is based assumes road traffic noise only, not any aircraft generated noise and any alterations which may result from the closure of runway 16/34.

Section 7.3 of the Noise and Vibration Assessment acknowledges that at present runway 16/34 carries approximately 30% of the air traffic with runway 02/20 carrying the remaining 70%. The report confirms that the volume of flights, the operating hours and typical annual usage patterns of the airport will remain unchanged and it also states that:

'The effect of operating 100% of the annual air traffic movements from a single runway [02/20] would be restricted to an increase in the number of days during which aircraft movements will be audible to receptors along the flightpath or close to the runway. This would not be expected to result in a significant adverse effect.'

No evidence appears to have been provided to support the conclusion that there will be no adverse effect from the altered flight patterns which could impact tranquillity within the Kent Downs AONB.

Natural England therefore recommends that a detailed tranquillity study for publically accessible areas of the AONB is undertaken to allow a detailed assessment of the potential impacts to receptors at key locations within the AONB. This should include a full assessment of the potential for changes to tranquillity that may result from all flights using runway 02/20. It would be helpful if a contour map were provided to show the baseline and predicted noise levels during operation of the Innovation Park for key locations within the AONB to aid the impact assessment process.

3.5.2. Comparable comments using very similar wording were submitted by the Kent AONB Group and a number of members of the public.

3.5.3. In accordance with the formal EIA Scoping Opinion, assessment of noise does not form part of the ES because no significant effects were considered likely.

3.5.4. Response to the Natural England consultation comments since the submission of the LDO application has been based around two topics:

i. The planning history associated with the closure of Runway 16/34

ii. The implications of the closure of Runway 16/34 on the tranquillity of the AONB.

3.5.5. The Applicant has engaged with Natural England regarding its consultation comments and initial information provided to Natural England in October 2019 confirmed that Chapter 4 of the ES provides an explanation of the reasons for the total number of flights (and flights across the AONB) being likely to decrease as a result of the closure of Runway 16/34. The Applicant also provided Natural England with an independent report prepared by Lichfields at the time of a previous planning application by Rochester Airport (MC/18/2505) (Appendix K to this Addendum), which draws a comparable conclusion with respect to the likely reduction in aircraft movements.

Planning history associated with the closure of Runway 16/34

3.5.6. The airport was leased from Medway Council in two parts when Rochester Airport Ltd took control of the site. Medway Council served Preliminary Notice on Rochester Airport Ltd in December 2016 with the view to terminating the second lease area (covering Runway 16/34) to release the land for commercial development.

3.5.7. It is important to note that the termination of the Rochester Airport lease for this area of the site is not directly linked to the LDO, as the decision to take an LDO forward was made later. Similarly, the decision for the council to develop the site rather than dispose of the land was made after the lease arrangements.

3.5.8. Rochester Airport Ltd submitted two planning applications in 2018. The first (MC/18/2505) was for demolition of existing buildings (including control tower, old clubhouse two portacabins housing the airport office and Skytrek office) and construction of a new control tower and hub building, ancillary car park, family viewing area and associated engineering operations. The second (MC/18/2509) was for relocation of two helipads within the airport to include the provision of landing pads together with the decommissioning of an existing helipad.

3.5.9. Neither planning application involved changes to the aircraft type, numbers, flight lines or operational hours but the location of the control tower and hub building for application MC/18/2505 are in the former flight line for Runway 16/34.

3.5.10. The runway was informally closed in July 2019 was formally closed in February 2020.

3.5.11. Irrespective of the development of the LDO, the planning permission for the new hub and control tower at the airport has been implemented and the associated works preclude any aviation use of the former runway.

3.5.12. Pre-commencement planning conditions have been discharged and archaeological investigation has been undertaken. The ground was not reinstated and this included an area of Runway 16/34. Site works have commenced and construction of the hub and control tower building (which is

also within the runway/safeguarding area) is understood to be commencing shortly. This will therefore preclude the reopening of Runway 16/34 in the future.

3.5.13. In the context of planning permission MC/18/2505, the current and future baseline with respect to aviation movements at the airport is one without the cross runway. Implementation of the LDO therefore would not cause any change to the future baseline.

Implications of the closure of Runway 16/34

3.5.14. The Lichfields report (Appendix K to this Addendum) summarised the role of the runways within the airport:

'*The airport operates in visual conditions rather than instrument. Runway 34/16 is a cross runway and Runway 02/20 is the main runway. There is also a relief runway adjacent to Runway 02/20.*

The cross runway currently provides the airport with a greater usability factor during periods of changing wind conditions, by providing an alternative runway to support aircraft with a certain maximum cross wind component that are unable to land or take-off on the main runway.

The airport is not required to define the split of traffic between the two runways to the Civil Aviation Authority (CAA) nor is it currently subject to any planning controls by the local planning authority.'

3.5.15. The role of Runway 16/34 as the cross-runway was such that it would have had a lower proportion of aviation movements than the main runway; it would generally have been used in certain wind conditions by certain aircraft when use of the main runway would have been outside the design parameters of those aircraft.

3.5.16. The 'when needed' nature of cross runway use is however such that there is no data available on the proportional split of total aviation movements between the two runways. Even if data were available, closure of Runway 16/34 would not result in a direct transfer of these aviation movements onto Runway 02/20 because the reason for aircraft needing to use the cross-runway was because they could not use the main runway in certain wind conditions.

3.5.17. The number of annual / daily aviation movements to and from the airport is not restricted. A cap has been previously discussed with Medway Council when a hard runway was proposed by the Airport, however the grass runway was retained, which did not necessitate a cap.

3.5.18. Information provided within an aviation risk assessment prepared in relation to a previous planning application by Rochester Airport Ltd for the 10-year period between 2007 and 2017 (Appendix 4-1 to the ES) has shown a generally reducing pattern in the total number of movements:

- 2007 - 30,601
- 2008 - 27,010
- 2009 - 24,840
- 2010 - 21,688
- 2011 - 24,289
- 2012 - 18,747 (movements reduced, due to airspace restrictions imposed during the London Olympics)
- 2013 - 23,540
- 2014 - 23,893
- 2015 - 23,765

- 2016 - 22,321
- 2017 - 23,800

3.5.19. The pattern of movements shown above confirms that residential and recreational receptors within the AONB will have experienced substantially higher numbers of aircraft movements in the recent history than take place at present.

3.5.20. It is also considered likely that the pattern of decreasing total aviation movements at the airport will continue following the closure of Runway 16/34. Paragraph 4.5 of the independent Lichfields assessment (Appendix K to this Addendum) confirmed that:

> '*Closing the cross runway will reduce the airport's usability factor. It would not be the case that all cross-runway traffic would be diverted to the main runway: of the aircraft that are less susceptible to changing wind conditions, these aircraft can already opt to use either runway; and those aircraft types that are susceptible to changing wind conditions may not be able to use the airport to land and take off, meaning as a consequence a possible reduction in total aircraft movements.'*

3.5.21. This is the same conclusion separately reached within Chapter 4 of the IPM ES.

3.5.22. It is noted that where the Natural England consultation response made reference to section 7.3 of the Noise Assessment submitted as part of the LDO application (but not part of the ES), this was partial and the full section acknowledges that there were already periods in each year when all air traffic movements into and out of the airport were using the remaining 02/20 runway:

> '*The volume of flights, operating hours, and typical annual usage patterns of the airport would remain unchanged from the present formation. It is noted that, subject to no significant changes to the wind direction during the daytime, there will already be a number of days (or consecutive days) each year during which all air traffic will utilise runway 02/20 for the entire day (or entirety of the consecutive days). The effect of operating 100% of the annual air traffic movements from a single runway would be restricted to an increase in the number of days during which aircraft movements will be audible to receptors along the flight path or close to the runway. This would not be expected to result in a significant adverse effect.*'

Conclusion

3.5.23. The Applicant has engaged with Natural England and the planning authority (in relation to its duty to have due regard to the purpose of conserving and enhancing the natural beauty of the AONB under the Countryside and Rights of Way Act 2000) regarding the potential effect of the Proposed Development on the tranquillity of the AONB and has drawn the following conclusions:

- The decision to close runway 16/34 preceded the IPM development and hence is not a direct or indirect effect of the Proposed Development;
- The trend in annual aviation movements at the airport has been decreasing since 2007;
- The future pattern of daily average aviation movements at the airport is envisaged to decrease as a result of the closure of runway 16/34 due to a reduction in the usability factor;
- The IPM development will not have any influence on the pattern or numbers of aviation movements at the airport.

3.5.24. As a result of the current position with respect to consented operational changes to the airport, as outlined above, the existing and future baseline position (in EIA terms) is one with all aviation

movements associated with the airport crossing the AONB (hence the baseline tranquillity of the AONB is already influenced by aviation movements). By virtue of the fact that the LDO would have no direct or indirect effect on the number or type of aviation movements, it is considered that there will not be potential for the LDO to have any significant environmental effects on tranquillity within the AONB from aviation. As such, it is considered that assessment of AONB tranquillity within the ES should not be required.

4.0 SUMMARY OF SIGNIFICANT RESIDUAL IMPACTS

4.1. Residual effects

4.1.1. **Table 4.1** below presents a summary of the significant residual effects for each topic chapter in the ES, following the implementation of secondary mitigation. Following the approach set out in Chapter 2 of the ES, these are residual effects that are considered to be of 'moderate' beneficial or adverse significance and above.

4.1.2. There are no additional significant residual effects compared to the original assessment set out in the ES.

Table 4.1: Significant residual effects of the Proposed Development

Subject	Conclusion
Air Quality - *Dust*	Not significant
Air Quality - *Operational Impacts*	Not significant
Air Quality - *Impact on the AQMA*	Mitigated by provision of a sum of £1,544,660 to offset impacts
Community, Social and Economic	Positive short-term significant effect on job creation during the construction phase and positive long-term effect on job creation post-construction
Ground Conditions	Not significant
Landscape and Visual - *Impacts on landscape character*	Not significant
Landscape and Visual - *Impacts on AONB*	Not significant
Natural Heritage and Ecology - *Impact on designated sites*	Not significant
Traffic and Transport	Not significant subject to the proposed mitigation strategy
Cumulative and In-combination effects	Not significant