

## Innovation Park Medway

### Environmental Statement Addendum

For



## INNOVATION PARK MEDWAY

Project Number:

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## 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 1<sup>st</sup> 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/](http://www.publicaccess1.medway.gov.uk/online-applications/)
  - Tonbridge and Malling Council Planning Register: [www.publicaccess2.tmbc.gov.uk/online-applications/](http://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%
<b>Total</b>	<b>45,560</b>	<b>46,493</b>	<b>-2.1%</b>

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