



Planning Representations
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Environment, Planning and Enforcement

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BY EMAIL ONLY

19 July 2019

Dear Sir / Madam,

Re: Innovation Park Medway, Rochester, Medway, ME1 2XX

Thank you for consulting Kent County Council (KCC) on the proposed Local Development Order (LDO) and accompanying Environmental Statement (ES) in support of the creation of a mixed use business park, featuring c101,000sqm of predominantly high-tech and innovation-oriented B1/B2 commercial uses.

The County Council is supportive of the proposed DCO put forward by Medway Council for Innovation Park, which will meet an existing need for employment floorspace in Medway. The creation of new employment at the site is welcomed and will create valuable opportunities for people across Kent and Medway. The opportunity to drive new inward investment to Innovation Park is clear and will provide local agencies, such as Locate in Kent, with a quality offering that assists Kent and Medway to be recognised as a first choice location for businesses. With the site having already attracted an allocation of £8.1 million in Government support through the Local Growth Fund, the site is well positioned to operate as a high value employment centre.

KCC has reviewed the submitted documentation and would like to raise the following comments.

Highways and Transportation

The site lies to the north of the Bridgewood Roundabout, Taddington Roundabout and Lord Lees Roundabout at the M2/A229 junction (M2 Junction 3). A significant proportion of the trips generated by the proposal are expected to pass through these junctions, which already suffer capacity problems.

The Transport Assessment (TA) (dated 2019) considers the impact of the development, which is expected to generate approximately 1,092 vehicle trips in the AM peak and 753

vehicle trips in the PM peak (two way). This will be distributed across the surrounding highway network.

Microsimulation modelling has been undertaken for a 2028 time horizon to determine the impact of the proposed additional development traffic. Potential mitigation measures have been coded into the 'with mitigation' modelled network. These mitigation measures, including proposals for increasing entry flares and additional lanes and signal timing optimisations at Bridgewood and Lord Lees, are set out in section 6.2 of the TA. It is concerning that these measures have not been assessed in terms of engineering feasibility or deliverability or whether third party land may be required. Whilst it is anticipated that the works can most likely be achieved within highway land, the feasibility and deliverability, and whether the measures proposed will realistically lead to an improvement in capacity, should be properly investigated and determined. For instance, the traffic signals in this area are already operating dynamically, with 'real time' adjustment made to timings according to changing traffic flows. It is considered that lane discipline and blocking back across entry arms are more significant inhibitors to efficiency and that more significant interventions are needed.

Whilst the County Council, as Local Highway Authority for Kent, has concerns over the practical mitigation of the Innovation Park, it is accepted that a joint longer term solution is required in the area, to include input from Highways England. This is necessary to bring schemes forward to address concerns over likely future traffic impacts on the A229 strategic link between M2 and M20 via Taddington and Lord Lees Roundabouts, including from the proposed Lower Thames Crossing. As part of this, a Pre Strategic Outline Business Case (SOBC) has recently been submitted to Transport for the South East for Large Local Major (LLM) scheme funding for significant upgrades to A229 Blue Bell Hill, including M2 and M20 junctions. It is hoped that this will receive approval to progress design work for potential construction from April 2024 and opening in 2026.

With this in mind, a potential way forward in respect of the Innovation Park could be for the Bridgewood Roundabout improvements to be more fully investigated (as set out above) and then implemented by the developer via a Section 278 Agreement. The measures proposed at the Lord Lees Roundabout should be fully investigated and costed and, subject to the agreement of the County Council, should be secured as a contribution to enable the Highway Authority to deliver as a scheme or to contribute to a more significant enhancement as set out above.

The County Council has reviewed the proposed LDO highway conditions (H1 – H8). The majority of these conditions relate to how required standards will be met within the site and at its access, which is within Medway Council's responsibility as Local Highway Authority.

Condition H8 relates to works to be carried out on the public highway, to be approved prior to occupation. This condition must make reference to the County Council as the approving authority for any specified works to the public highway within its area of responsibility.

KCC requests that the Travel Plan (referred to in H4), any subsequent monitoring and the Construction Management Plan (condition C1) must be shared with the County Council, where the impact will be within its area of responsibility.

For informative 6, which relates to Section 106 contributions, KCC requests that the presumption should be that the developer undertakes all necessary mitigation works (subject to the approval of the relevant authority) and where this is not feasible, the Section 106 mechanism should be used, if agreed by that authority.

Minerals and Waste

The County Council, as Minerals and Waste Planning Authority for Kent, has no comments to raise on this LDO.

Sustainable Urban Drainage Systems (SuDS)

The County Council, as Lead Local Flood Authority for Kent, is content with the LDO from a surface water drainage perspective. The conditions relating to the provision of a surface water drainage system and verification of construction, as listed within the LDO, are acceptable.

Heritage Conservation

Background

The County Council has had previous involvement as Medway Council's archaeological advisor, and previously advised (at the EIA screening and scoping stages) that the site's archaeological potential was uncertain, due to a lack of past investigation. It is generally considered unlikely that remains of national significance exist on the site, but such remains cannot be entirely ruled out. It was judged that archaeological matters could be dealt with by conditions within the LDO (it is noted that conditions A1 to A4 of the draft LDO relate to archaeology).

The County Council notes that archaeological works are underway on the Rochester Airfield site, in relation to works to improve the airfield. These works fall outside of the LDO area, but have revealed intact archaeology of Prehistoric and Romano-British date; demonstrating the potential for archaeological remains to be present. The Romano-British archaeological features include quantities of tile/brick, which could be indicative of a Roman building in the general area of the airfield.

Whilst it was determined that archaeology would not be considered as part of the EIA process, it was agreed that an Archaeological and Built Heritage Desk-Based Assessment would be prepared as part of the LDO supporting evidence base. The draft LDO does refer to an Archaeological and Heritage Impact Assessment prepared by CampbellReith, but this document does not appear to be listed within the LDO consultation documents, KCC requests an opportunity to have sight of this document.

The proposed Schedules

The archaeological conditions are applicable to development that falls under Class 1 of Schedule A, Class 1 of Schedule B and Class 7 of Schedule D. KCC considers that the draft LDO has correctly identified where archaeological conditions would be applicable.

In addition, KCC notes that works permitted under Classes 2, 3, 4, 5 and 6 of Scheduled D could result in impacts on below ground archaeology. As archaeological impacts would not occur in all instances, KCC recommends that any archaeological requirements could be secured by means of additional conditions, in line with paragraph 4.19 of the draft LDO.

The draft conditions

Conditions A1 to A4 of the draft LDO relate to the site's archaeological interest.

Condition A1: This condition requires the agreement of a written scheme of investigation / method statement for the site's archaeological evaluation.

Condition A2: This condition requires the submission of a written report, setting out the results of the archaeological evaluation works agreed under Condition A1. The condition notes that the report on the evaluation works should include a strategy for the subsequent preservation in situ of archaeological remains and/or further archaeological investigation and recording.

KCC notes that preservation of archaeological remains would be dependent on there being sufficient flexibility in any design code, parameter plans and/or masterplan. If these do not allow for sufficient flexibility, then layout elements may become fixed too early and would remove the ability to meaningfully preserve important archaeological remains in situ.

KCC recognises however that not all archaeology will warrant preservation in situ. It is likely that the site will also contain archaeological remains whose character or significance is such that their loss can be accepted, provided that there is opportunity for such remains to be appropriately investigated and recorded. Such investigation measures might include archaeological excavation/investigation ahead of development, a watching brief during construction or a combination of the two.

As such, KCC considers there is a need for an additional archaeological condition after Condition A2 to cover such instances where safeguarding (preservation in situ) or further investigation and recording of archaeological remains is required. Such an additional condition should require a) agreement of a written scheme of investigation / method statement for the preservation in situ of important archaeological remains and/or further archaeological investigation and recording; and b) the requirement to submit a Post-Excavation Assessment Report and Updated Project Design detailing the results of any safeguarding or investigation and recording works.

Condition A3: This condition refers to the need for the publication of the archaeological investigations and the deposition of the resulting finds and archive. The inclusion of this

condition is welcomed. KCC recommends that the condition would be more appropriately titled as "Publication and Archiving".

KCC understands that Rochester Guildhall Museum (Medway's museum) is not currently accepting archaeological archives as it is now full and that it does not have the capacity to accept new depositions. At present, archaeological archives are generally being held by the archaeological contractors, but this is not a sustainable long-term solution. Medway Council may wish to consider ways in which an appropriate contribution could be secured to cover the long-term storage and curation of any archaeological archive generated.

Condition A4: This condition relates to archaeological conduct and KCC has no objection to its inclusion.

Masterplan / Design Code

In respect of the Innovation Park Illustrative Masterplan, included within the draft Design Code, KCC would encourage the promoter to consider ways in which the development could draw positively on the site's airfield history. Features like the circular airfield marker and the lettering 'ROCHESTER' are typical of historic grass airfields. Historic aerial photographs suggest that the present marker is on, or close to, the location of its WW2 equivalent. The marker seemingly falls within the proposed Innovation Park site and it would be a shame if this feature could not be retained or reflected in the masterplan. Other features, like the arrangement of the grass runways, would be affected by the proposal, but their various alignments could perhaps be reflected in any future masterplan layout for the site. It is recommended that the applicant also considers other means by which the historic airfield use of the site could be used to provide Innovation Park Medway with a sense of place. This could, for example, be through masterplan design, but might also include other measures, such as landscaping, public art and on-site interpretation.

Biodiversity

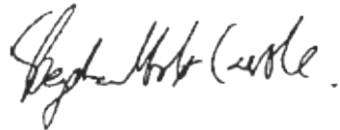
The County Council considers that the Environmental Statement provides a good understanding of species and habitats that are present within the site and highlights the species and habitat mitigation that will be required as part of the development.

The County Council would like further information to be submitted regarding the implementation of mitigation measures and details of where any off site mitigation will be located – this information should be provided within a detailed Mitigation Strategy. The County Council notes that no ecology conditions have been proposed as part of the LDO and recommends that there should be a condition requiring the submission of a detailed Mitigation Strategy.

The County Council is supportive of the proposal put forward by Medway Council for Innovation Park and the role that the development will have in boosting employment opportunities within Kent and Medway. The County Council will continue to work closely with Medway Council and Tonbridge and Malling Borough Council to help ensure the delivery of the Innovation Park.

If you require any further information or clarification on any matter in this letter, please do not hesitate to contact me.

Yours faithfully,

A handwritten signature in black ink, appearing to read 'Stephanie Holt-Castle'.

Stephanie Holt-Castle

Interim Director – Environment, Planning and Enforcement