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DATE

Dear Catherine

Medway Local Plan: Development Strategy Options

Thank you for consulting Maidstone Borough Council on the above document. This response has been considered and agreed by this council's Strategic Planning, Sustainability & Transportation Committee at its meeting on 12th June (**TBC**).

This council acknowledges and welcomes Medway Council's active consideration of how it could meet development needs within its own boundaries, including assessing how the increased housing requirement which would result from the Government's proposed standardised methodology could potentially be accommodated within Medway (scenario 3).

Transport

It is noted that the strategic transport modelling completed so far to support the emerging Local Plan has not yet been published. The consultation document indicates that the modelling to date has been in the form of a 'do nothing' approach to identify which junctions would reach/exceed capacity by the end of the Plan period. It is also understood that this first phase of modelling includes background growth generated from neighbouring authority areas but does not, as yet, incorporate the specific pattern and volume of additional traffic generated by planned development in those other areas, including that consented and forthcoming from the Maidstone Borough Local Plan. Furthermore, the 'do something' options, i.e. mitigation measures and intervention such as junction improvements, public

transport measures and, potentially, a Park & Ride site which would support the development scenarios are all yet to be tested. This will be done to inform the selection of Medway's preferred development option in advance of the next round of consultation on the draft Medway Local Plan (Regulation 19 stage).

Maidstone Borough Council considers that this next phase of strategic transport modelling must specifically assess and identify the need for additional mitigation schemes for key junctions within Maidstone borough which could be impacted by the scale of growth proposed in Medway in combination with that already committed in Maidstone borough and elsewhere. MBC's previous consultation response to the Development Options document specifically highlighted that development around Rainham and Hempstead could have a significant impact on M20 Junction 7 and the southern end of the A249. Scenarios 1,3 & 4 in the current consultation document would each include new housing development in these locations. The M20 Junction 7 already suffers from traffic congestion at peak times and requires capacity improvements in order to accommodate growth planned in Maidstone borough to 2031.

More widely, development across Medway is likely to impact on the highway network at Bluebell Hill (A228), M20 Junction 6 and, potentially, at Boxley Road.

MBC undertook specific assessment of M20 Junctions 5-8 for the Local Plan Examination to identify the mitigation required to support this borough's growth. The report is available here:

[http://services.maidstone.gov.uk/docs/TRA%20037%20\(A\)%20M20%20Junction%20Assessments%20\(November%202016\).pdf](http://services.maidstone.gov.uk/docs/TRA%20037%20(A)%20M20%20Junction%20Assessments%20(November%202016).pdf)

It is vital that the potential impacts of Medway's proposed growth on the road network within Maidstone borough is properly assessed and addressed. MBC requests that the findings of the transport modelling pertinent to this borough are shared in a timely manner in advance of the next Regulation 19 consultation through on-going Duty to Co-operate engagement between the authorities. Transportation matters are likely to be a key cross boundary issue to be addressed in any forthcoming Statement of Common Ground between the two authorities.

Air Quality & Habitats Regulation Assessment

Linked to the issue of transport is the effect that the proposed growth in Medway could have on air quality and in particular on the two European nature conservation sites in Maidstone borough, namely the North Downs Woodlands Special Area of Conservation (SAC) and the Queensdown Warren SAC.

The consultation document confirms that strategic air quality modelling will be undertaken to inform Medway Council's selection of its preferred development option. As for transport, the potential linked effects on areas of poor air quality in Maidstone borough should also be part of this strategic assessment. Attached is a plan showing the Maidstone Air Quality Management Area (AQMA) which has been designated as a result of NO₂ levels linked to traffic emissions (**AQMA map to be included**). The AQMA extends to the north of both M20 Junction 6 (A229) and Junction 7(A249) illustrating that air quality in these locations, and further into the heart of Maidstone, could be worsened by Medway's growth unless it is a) adequately assessed and b) mitigation measures are instituted.

In respect of the assessment of impacts on the SACs, an interim Habitats Regulation Assessment Report (HRA) has been published in support of the current consultation.

Part of the North Downs Woodland SAC is located along the Wouldham – Detling escarpment. The designated SAC area is within 5m of the A249 at Detling Hill at its closest point in the east and within 160m of A229 at Blue Bell Hill in the west. The SACs are sensitive to deteriorating air quality (increases in Nitrogen Dioxide) resulting from increased traffic movements associated with development.

The interim HRA study has used the (unpublished) Medway Strategic Transport Assessment and air quality monitoring data. At this stage, Maidstone Borough Council notes that an initial finding of the study is that development has the potential to worsen air quality impacts on the woodland in the North Downs SAC. The report states that further assessment will be undertaken, drawing on the strategic air quality modelling, to more precisely determine the actual effects to inform the selection of the prepared option.

As for the transport modelling, Maidstone Borough Council considers that the air quality impacts of Medway's growth plans on Maidstone's AQMA should be assessed and any mitigation measures required should also be identified prior to the Plan moving to its next stage. The findings should be shared with Maidstone Borough Council prior to the Regulation 19 consultation on the Medway Local Plan.

Employment sites

It is noted that the document signals a potential new office location close to M2 Junction 4 but provides little detail in terms of scale and exact location at this stage. Maidstone Borough Council would request to be updated as proposals for this allocation become more definitive so that the council can determine whether it could impact on this borough's existing and forthcoming employment sites.

Gypsy & Travellers

In response to specific question QH21, Maidstone Borough Council considers that Medway Council should make specific site allocations in its Local Plan to ensure that the future need for Gypsy and Traveller pitches can be met.

I look forward to our continuing active engagement on strategic matters affecting our two areas and collaboration to achieve an agreed Statement of Common Ground prior to the submission of the Medway Local Plan.

Yours sincerely,

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