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Unique Interested Party Reference: LTC-SP097  
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Mr Rynd Smith  
Lead Member of the Examining Authority  
The Planning Inspectorate  
Temple Quay House  
Temple Quay  
Bristol  
BS1 6PN

Planning Service  
Culture and Community  
Regeneration, Culture and Environment  
Medway Council  
Gun Wharf  
Dock Road  
Chatham  
Kent  
ME4 4TR  
Telephone: 01634 306000

*By project webpage submission only*

Dear Mr Smith

**Deadline 8 Post-event submission: Issue Specific Hearing 12 Part 1, Action Point No. 14**

Please accept this letter on behalf of Medway Council in response to Issue Specific Hearing 12 Part 1, Action Point No. 14 regarding agenda item 3c - Local Plan Commitments.

Introduction

- This post-event submission draws on Medway Council's Local Impact Report [REP1-258].
- The Medway Local Plan 2003 contains Policy S12 and Policy S13. These policies set out strategic allocations at Kingsnorth and the Isle of Grain respectively. These are among the largest sites for economic growth in the Thames Estuary.

Kingsnorth

- Policy S12 designated a 219 ha site at Kingsnorth for commercial land uses. The policy provides for the expansion or relocation of businesses in the urban area.
- London Medway Commercial Park, which is located at Kingsnorth, was granted outline planning permission in 2009. There have been many reserved matters applications for the individual plots.
- In August this year, outline planning permission was granted for MedwayOne, a 325,000 sqm development of employment floorspace on the former Kingsnorth Power Station. The conditions include an initial trip cap of just 60 movements through M2 junction 1 links to enable a phase of development to come forward. This could be revised subject to a monitoring framework.

Isle of Grain

- Policy S13 designated a 630 ha site on the Isle of Grain for port activities and other commercial land uses.
- Grain Business Park was granted outline planning permission in 2009. In 2015, a reserved matters application took account of a revised masterplan which reduced the maximum permitted floorspace. A subsequent reserved matters application was also granted in 2015 for the first phase. The residual permitted floorspace is over 282,000 sqm. In February 2020, a Lawful Development Certificate was approved confirming that the outline

permission had commenced. National Grid intends to realise the full potential of their Isle of Grain site.

#### How could the Project hinder Medway Council's Local Plan delivery

- At Deadline 1 [REP1-183], the Applicant acknowledged that there will be increased traffic flows through M2 junction 1 following the opening of the Project, but this needs to be considered against the overall benefits resulting from the better connections and improved journey times.
- In this way, Medway Council considers that the Project would exacerbate the capacity and the safety of M2 junction 1, thereby hindering the delivery of allocations at Kingsnorth and the Isle of Grain.
- The Applicant's 'Scale of Impacts Maps' [APP-533] show moderate adverse impacts at M2 junction 1 in both the low and high growth scenarios. Presumably the scale of impacts would be worse if both MedwayOne and Grain Business Park were included in the Lower Thames Area Model (LTAM) core scenario.
- The Project's Order Limits straddle the M2 junction 1 links of concern, but no changes are proposed to these links.
- M2 junction 1 requires a strategic solution that would ideally have been part of the Project.
- Medway Council responded to the Road Investment Strategy 3 consultations earlier this year, but there is no certainty that M2 junction 1 will be taken forward in that process, and this could hinder the delivery of allocations at Kingsnorth and the Isle of Grain.

#### Preparing a new Local Plan

- Medway Council is at an early stage in preparing a new Local Plan; this work will benefit from ongoing, close collaboration with the spatial planning team at National Highways, particularly if the Project is granted development consent.
- Medway Council's Deadline 6a submission [REP6A-12] noted that a draft Forecasting Methodology Technical Note has been sent to the spatial planning team at National Highways for review. In short, the Reference Case (of committed developments) would include MedwayOne, but only up to an initial cap of 60 trips through the M2 junction 1 links, while 1,058 trips would be assumed for Grain Business Park, in line with the Section 106 agreement. Medway Council considers this to be a pragmatic approach, rather than omitting relevant planned development at Kingsnorth and the Isle of Grain as in the LTAM core scenario. However, the Applicant's position has remained unchanged on this matter.

Yours sincerely

*Andrew Bull*

Andrew Bull MRTPI  
Principal Planner (Spatial Data & Infrastructure)