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Our Ref: 2017-07-17-MDtoDH-1391

David Huggett
Persimmon Homes South East
Scholars House,
60 College Road
Maidstone
Kent
ME15 6SJ

Sent via email

Dear David,

HIGH STREET, NEWINGTON CONSULTATION RESPONSE

We have reviewed the recent correspondence from Professor Peckham prepared for on behalf of CPRE and the subsequent response from Steve Wilcock dated 30th June. We are in complete agreement with the response set out in the memorandum prepared by Steve Wilcock. Mr Wilcock has provided very thorough account of the Council's responsibilities which are undertaken in line with current government policy and good practice. We do not have anything further we can add to this statement.

It is noted that Professor Peckham found our assessment to be comprehensive, with the only notable comment on the variation between modelled and actual NO₂ levels. This variation is associated with the verification of the model against local monitoring data. It is generally accepted within the industry that without highly detailed traffic data (e.g. directional traffic data, queue lengths, average speeds) it would be difficult, if not impossible, to get the model to perform consistently at all locations, particularly when monitored concentrations vary significantly over such short distances, as they do in Newington. Another reason may be due to the margin of error associated with the monitoring itself. As Steve Wilcock states in his response, the monitored data could be out by as much as 40%. In our opinion, there would be no benefit gained by reassessing and verifying the model since we are already introducing a raft of mitigation measures in line with Swale Borough Council's, most up to date Air Quality Planning Technical Guidance (released in December 2016).

We are also of the opinion that the site is centrally located and within easy walking distance to the main railway line and bus routes along the A2, providing alternative means of transport to Medway or Sittingbourne. The site is not considered particularly far from local amenities. It should be noted that trains run to London stations 20 times a day with many during peak hours being of just over an hour's duration with the same number of trains run towards Sittingbourne. This is one of the notable benefits that this site has to offer in terms of public transport accessibility and its availability to commuters.

Yours sincerely,



Matt Dean
BEng (Hons) CEng CEnv C.WEM MCIWEM
Director

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