

Reference	Name	Organisation	On Behalf of
HDF 21	Jon Sullivan		
HDF 22	Mr and Mrs White		
HDF 23	Anna Woodward	Network Rail	
HDF 25	Bridget Fox	Woodland Trust	
HDF 26	Ron Sands	Ward Councillor	
HDF 27	Tamzyn Janes	Southern Water	
HDF 28	Roy Freshwater		
HDF 29	Sean Hanna	Natural England	
HDF 30	Martin Simmons		

Ref:

Planning for Growth on the Hoo Peninsula Response Form

This response form has two parts to complete below.

Data Protection

Personal information gathered on this form will only be used for planning policy purposes and will be held in accordance with the requirements of the Data Protection Act 2018. Your contact details will be **kept confidential** but your comments will form part of the public record of the consultation and published on the council's website. Please address any questions or requests regarding our data processing practices to planning.policy@medway.gov.uk.

Details about how your information will be held and used are found on the link below:
https://www.medway.gov.uk/info/200133/planning/714/planning_service_privacy_statement

Part 1 – Your Details

Name:

Jon Sullivan

Name of organisation (if applicable):

Address:

[REDACTED]

Email:

[REDACTED]

Phone:

[REDACTED]

Ref:

Part 2 – Your Response

- This public consultation proposes a vision for growth on the Hoo Peninsula.
- The vision should help to make it clear what we want to achieve. It should be clear, realistic and locally distinctive.
- The vision is important because it will guide the objectives, policies and design principles.

The proposed vision is:

By 2037, Hoo St Werburgh will be a thriving rural town, sensitively integrated into the extraordinary landscape of the Hoo Peninsula. A valued place providing homes, jobs and services for vibrant communities. A small town with an attractive choice of travel connections. A place built for the future, and respecting the past.

1. Do you get a clear sense of what the Hoo Peninsula will be like by 2037?

Yes ☐

No ☐

Comments:

2. Does the vision describe the Hoo Peninsula as opposed to anywhere?

Yes ☐

No ☐

Comments:

3. Does the vision reflect your priorities?

Yes ☐

No ☐

Comments:

4. Is it concise and easy to understand?

Yes ☐

No ☐

Comments:

5. How can we measure success of achieving the vision?

1. Comments: There is a legal requirement for the UK to be zero (net) emissions by 2020. How does this development facilitate this;
2. It is clear that the movement towards 0 emissions vehicles is well underway. Indeed, by 2035 all new car purchasing will be 0 emissions. How is this reflected in the planning.

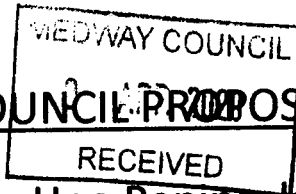
6. Can you set out a better vision for growth on the Hoo Peninsula? Please tell us:

**7. Please use the space below to make any other comments on the consultation document:
I have numerous questions:**

Ref:

3. **There is a legal requirement for the UK to be zero (net) emissions by 2020. How does this development facilitate this;**
4. **It is clear that the movement towards 0 emissions vehicles is well underway. Indeed, by 2035 all new car purchasing will be 0 emissions. How is this reflected in the planning.**

COMMENTS ON MEDWAY COUNCIL PROPOSALS



"Planning for Growth on the Hoo Peninsula"

From:

[REDACTED]

9 - APR 2020

MEDWAY COUNCIL	
FILE INFO	
9 - APR 2020	
	INITIALS

INTRODUCTORY REMARKS

As residents of Hoo St Werburgh for some 50 years, we have seen the village expanded massively in that time. New housing estates have been built down the whole of the north side of Bells Lane, at Four Wents, at the end of Pankhurst Road and in the village itself. Currently further large housing estates are under construction at Four Wents and in the village centre.

All of these developments have been permitted without any significant increase in facilities to cater for the vastly increased population of the village. A few additional shops and a second GP surgery have been opened, but facilities generally are inadequate for the size of the existing population. One example is the normal wait of 3-4 weeks for a GP appointment (even before Coronavirus).

The building of the "new" Ratcliffe Highway has vastly improved access to the Peninsula but, as recognised in the proposals, a major "pinch point" still remains at Four Elms Hill which, if blocked (as occurred twice in the past year), causes major access problems to the Peninsula.

With this background, we wish to propose the following measures be considered in planning the further development of the Hoo Peninsula.

COMMENTS

- Proposed Employment Hub at Kingsnorth

Clearly the success of the proposed development of the Peninsula will be largely dependent on attracting job opportunities to the area, without which an employment "desert" will be created, with attendant social problems. Therefore, it is essential that before any more housing is

permitted on the Peninsula the industrial hub is well advanced and employers signed up and in place.

Also, to avoid the current situation of lorries parking in every available lay-by and gateway on the Peninsula and on the roads around Kingsnorth, due to insufficient parking for them at the Amazon distribution centre, all units planned for the hub should be required to have adequate parking facilities for their needs.

- Health Facilities

In view of the current inadequacy of the existing GP/Health Services in the area to meet the needs of the current population of Hoo, it is suggested that before any further housing is approved for the area, improved GP/Health Centre facilities be established. One possibility would be to require housing developers to build and staff such facilities as part of their planning permissions.

- Access to the Peninsula

The employment hub will inevitably lead to a considerable increase in traffic accessing the Peninsula, particularly commercial vehicles en-route to the hub. Without an alternative route into the Peninsula, any blockage of the Four Elms Hill “pinch point” will have the effect of creating gridlock throughout Medway, as has occurred in the past. Consideration should therefore be given to creating a totally new alternative route to Four Elms Hill in advance of further development of the area, as simply providing a left-turn slip road onto it from the bypass from the A2 is unlikely to overcome the problem.

We hope that these few observations are helpful and will be taken into account in the further planning of development of the Hoo Peninsula.





E:

T:

22 April 2020

Medway Council Planning Policy
Gun Wharf, Dock Road
Chatham
Kent
ME4 4TR
By email: planning.policy@medway.gov.uk

Dear Sir / Madam

Planning for Growth on the Hoo Peninsula, Network Rail Consultation Response

Thank you for the opportunity to review and comment on the above consultation for the planning of potential growth at Hoo Peninsula. At this early stage in the policy planning process, Network Rail is able to provide high level guidance around the implications of the set out planned growth.

Having considered the details of the consultation I can confirm that Network Rail wishes to make the following comments. These comments should be considered in the context of the early development phase of these concepts and are subject to change as more detail and clarity is available.

1. New Station

As a key stakeholder in transport infrastructure in the area, Network Rail is very supportive of Medway Council's proposals to unlock development of 10,600 homes on 283.5 hectares in a new rural town at Hoo St Werburgh, and in a wider network of villages. Network Rail will be working alongside Medway Council and rail industry partners to ensure the delivery of sustainable transport infrastructure funded by the recent £170 million award from the Housing Infrastructure Fund (HIF) to help unlock these housing developments.

2. Reintroduction of passenger service on grain branch

Network Rail are supportive of the plan to reintroduce passenger trains on the Grain Branch as it should have the impact of reducing both road traffic and passenger numbers from the Hoo Peninsula using Strood/Rochester Station's. This would free up space for new passengers from the Medway Towns and reduce traffic. Network Rail welcome further discussions on this. There will be implications of this that need to be assessed thoroughly and likely mitigation measures implemented. One of these is the impact on the safety of level crossings, to be discussed below.

3. Level Crossing Considerations

Level Crossing safety is one of Network Rail's key priorities. We are required to manage risk so that it is as low as reasonably practicable at level crossings while keeping communities safe and connected.

There are 15 crossings on the Hoo to Grain line (HTG) all of which do not have any additional protection and solely rely on the user using their own eyes to look for any oncoming trains. Users can be on foot or

in large vehicles such as tractors and farm machinery. Any increase in traffic, be that vehicles, pedestrians or rail traffic, will have a significant impact in terms of the safety at these crossings which are not fit for purpose to deal with this. As such, Network Rail will review any proposed site allocations in the Draft Local Plan when it is out for consultation and will provide any further, more detailed comments at that time. Network Rail may need to seek contributions from developments which will have an unacceptable increase in risk to level crossings.

Closing level crossings is the only way to fully eradicate the risk. However, it is not always possible or practicable to immediately close all level crossings. Aside from financial and practical constraints, user convenience still needs to be a key consideration. A broad range of targeted interventions and initiatives are therefore needed to manage safety at crossings which remain open.

If you require any further information or have any queries relating to anything contained within this letter please do not hesitate to contact me.

Yours Sincerely,

Anna Woodward
Town Planner
Network Rail

Ref:

Planning for Growth on the Hoo Peninsula Response Form

This response form has two parts to complete below.

Data Protection

Personal information gathered on this form will only be used for planning policy purposes and will be held in accordance with the requirements of the Data Protection Act 2018. Your contact details will be kept confidential but your comments will form part of the public record of the consultation and published on the council's website. Please address any questions or requests regarding our data processing practices to planning.policy@medway.gov.uk.

Details about how your information will be held and used are found on the link below:
https://www.medway.gov.uk/info/200133/planning/714/planning_service_privacy_statement

Part 1 – Your Details

Name:

BRIDGET FOX

Name of organisation (if applicable):

WOODLAND TRUST

Address:

[REDACTED]

Email:

[REDACTED]

Phone:

[REDACTED]

Ref:

Part 2 – Your Response

- This public consultation proposes a vision for growth on the Hoo Peninsula.
- The vision should help to make it clear what we want to achieve. It should be clear, realistic and locally distinctive.
- The vision is important because it will guide the objectives, policies and design principles.

The proposed vision is:

By 2037, Hoo St Werburgh will be a thriving rural town, sensitively integrated into the extraordinary landscape of the Hoo Peninsula. A valued place providing homes, jobs and services for vibrant communities. A small town with an attractive choice of travel connections. A place built for the future, and respecting the past.

1. Do you get a clear sense of what the Hoo Peninsula will be like by 2037?

Yes ☐

No ☐

Comments: n/a

2. Does the vision describe the Hoo Peninsula as opposed to anywhere?

Yes ☐

No ☐

Comments: n/a

3. Does the vision reflect your priorities?

Yes ☐

No ☐

Comments: The Woodland Trust supports the aspiration for landscape-led planning, accessible green spaces, planting new native species and protecting ancient woodland with appropriate buffers. We would like to see protection for trees outside woods; greater recognition of the role of trees in the built as well as the natural environment; and specific targets for increasing tree canopy cover and for access to woodland.

4. Is it concise and easy to understand?

Yes ☒

No ☐

Comments:

5. How can we measure success of achieving the vision?

Comments: The Woodland Trust recommends setting targets for tree canopy cover and for access to woodland.

6. Can you set out a better vision for growth on the Hoo Peninsula? Please tell us:

We commend to Medway Council the Trust's planning policy and guidance notes to inform the emerging vision:

- Local Authority Tree Strategies (2016)
- Planners' manual for ancient woodland and veteran trees (2019)
- Residential developments and trees - the importance of trees and green spaces (2019)
- Emergency Tree Plan - how to increase tree cover and address the nature and climate emergency (2020).

Ref:

7. Please use the space below to make any other comments on the consultation document:

Principle 1 – Landscape-led development

- i. The Woodland Trust welcomes the approach that seeks to preserve and improve the existing natural environment for people and local wildlife, and provide better public access to natural assets.
- ii. In particular, we welcome the commitment to retaining the green buffer to protect ancient woodland. Areas of natural woodland, in particular ancient woodland, are vulnerable to pollution, encroachment from development, and habitat fragmentation. It is important that any development is located and designed to avoid damaging ancient woodland, providing buffers for designated sites and protecting connectivity between wildlife habitats. Further information is available in the Trust's *Planners' Manual for ancient woodland*. We would propose extending this protection to veteran trees within the development area, in line with the National Planning Policy Framework (NPPF) (paragraph 175c).
- iii. We welcome the commitment to plant native species of trees, including orchards and hedgerows, to enhance quality of the environment and support biodiversity. We would further encourage the specification where possible of UK & Ireland sourced and grown tree stock, to support biodiversity and resilience.
- iv. The Woodland Trust's *Woodland Indicators by Local Authority (2016)* reports that Medway Council has 5.8 per cent woodland cover: *Woodland indicators by parliamentary constituency (2019)* reports that the Rochester & Strood constituency has 3.6 per cent woodland cover. This data is based on the [National Forest Inventory](#) and primarily counts woodland of 0.5 hectares and over so will underestimate smaller areas of tree cover outside woods. However, it is a good guide to the presence of woodland at scale that is effective in carbon capture and storage. As part of the necessary response to the climate and nature emergencies, the Woodland Trust supports the UK Committee on Climate Change call for an increase of tree canopy cover from the current UK average of 13 per cent to 18 per cent. Kent County Council has also adopted this target.
- v. The Trust's Emergency Tree Plan sets out recommended policies to help achieve this, including setting an area-wide tree canopy cover target of up to 20 per cent and a specific target for new development sites of 30 per cent tree canopy cover. Setting such a target for development on the Hoo Peninsula could make a valuable contribution to increasing Medway's tree canopy cover target.
- vi. We welcome the aspiration to provide access to high quality green spaces on the doorstep. The Woodland Trust has developed a Woodland Access Standard to complement English Nature's Accessible Natural Green Space Standard. This recommends that no person should live more than 500m from at least one area of accessible woodland of no less than 2ha in size, and that there should also be at least one area of accessible woodland of no less than 20ha within 4km (8km round trip) of people's homes.
- vii. The Trust's *Woodland Indicators by Local Authority (2016)* reports that 35.54 per cent of the population of Medway has accessible woodland within 500m of where they live. We recommend that 100 per cent of the new development proposed on the Hoo Peninsula should have accessible woodland within 500m.

Principle 3 - Vibrant and sustainable neighbourhoods

- i. We welcome the aspiration to provide a comprehensive pedestrian friendly green infrastructure network and high quality public spaces.
- ii. We suggest adding explicit reference to planting and maintaining trees, integrating the general tree planting aspiration into neighbourhood plans. Urban trees and hedgerows make a significant positive contribution to the appearance of the public realm as part of its green infrastructure; they enhance wellbeing, providing shelter and shade, and play an important part in absorbing CO2 emissions, reducing the impact of pollution and providing wildlife habitats.

Principle 4 – An attractive and tailored built form

- i. We welcome the aspiration that development will be designed to minimise impacts on the environment. However, the absence of reference to the role of trees in particular and green infrastructure in particular is a grave omission from this section. Trees in residential areas provide

Ref:

valuable micro-habitats and contribute to habitat connectivity as well as enhancing the quality of the built environment and providing resilience to the impacts of climate change.

- ii. Design guidance should incorporate the protection and extension of green infrastructure including support for SuDS in all new developments, and encouragement of green links, such as tree lines and hedgerows, to frame residential areas and connect existing habitats.
- iii. We recommend adopting a policy that requires the retention of existing trees and hedgerows unless unavoidable, as part of a landscape-led planning approach. We further recommend adopting a greater than 1:1 requirement for tree replacement to compensate for loss of existing trees based upon the size of the trees to be lost.
- iv. In addition, as noted above in our comments on Principle 1, we recommend adopting a target of 30 per cent tree canopy cover for development sites, to be achieved by a mixture of retention of existing trees and hedgerows and new planting.

We welcome opportunities to work with Medway Council officers and members and to contribute further to the emerging Local Plan and to your work on trees and woodlands.

April 2020

Bridget Fox Regional External Affairs Officer - South East

[Redacted signature block]

From: [REDACTED]
Sent: 04 May 2020 09:31
To: futuremedway
Subject: Planning for Growth on the Hoo Peninsula

Follow Up Flag: Follow up
Flag Status: Flagged

The Planning for Growth on the Hoo Peninsula Consultation 2020 - Medway Council Local Plan

I most strongly object to the emerging Medway Council Local Plan and Medway Council's current Development Strategy with regards to the development of a "Small Rural Town" around Hoo and Chattenden. I believe that the Local Plan will eventually be declared NOT SOUND and it will be thrown out when it reaches the Independent Examination stage. I realise Hoo Parish Council will be making a full response and representation to Medway Council when they publish their draft Neighbourhood Plan and will also be presenting a comprehensive report, including evidence and statistics, to the Independent Examiner and the Secretary of State on why Medway Council's Local Plan is fundamentally NOT JUSTIFIED and NOT SOUND.

A very shiny and factually incorrect document has been produced, in fact it's a developers enhanced sales pitch. Unfortunately, it bears no resemblance to Hoo and the way which developments have destroyed the area. Most photographs are not of Hoo but instead the fairytale Medway is trying to sell to the people of Hoo. This document lacks facts in every chapter and has no details of where and how many houses will go. Once again, views of local residents already calling Hoo home, that they have expressed time and time again that they have no wish for this level of development of the area in which they live are dismissed.

It is obvious from recent developments that Medway Council's local plan is in fact a developers led plan and that commercial priorities will influence and control the large number of developments. When will Medway Council understand that by full consultation with the people of Hoo and the Peninsula and listening and acting upon that consultation, will residents become partners in a scheme of this magnitude. At present I don't think we can achieve the vision set out in this fantasy consultative document.

Protection of our countryside, of our Peninsula, is I believe crucial to the health and well-being of the whole of the Medway and possibly Kent and beyond. "Planning for Growth on the Hoo Peninsula" and the Local Plan does nothing to protect either.

This vision and the whole Local Plan must avoid harming the natural environment and protect the best of our heritage. The inclusion of the Hoo Peninsula into the Kent Downs AONB could be seen as a way forward in protecting and developing our rare and historical area, our lowland and ancient woodlands, our grasslands and marshes, all of which are of national and international

importance. I don't understand why the Peninsula was not included in the Kent Downs ANOB in the late 1990's it would seem an obvious inclusion especially as the council was so against the airport.

And whilst our inclusion in AONB would not be a deterrent to development, what it could achieve is better quality of build and the use of materials which are integral to the character of the area and is harmonious within the landscape. However, this of course should not be seen as a reason not to build "affordable housing", in fact could and should lead to a growth in community led rural housing, with much of this type housing having some form of ring fencing for people with a link to the peninsula or work here and providing this type of housing so that young people and families can remain in their community and this in turn benefits the whole community.

It must be argued that we need to bring back into the housing market the vast numbers of empty homes that we all know are prevalent within the already built Medway area. How many homes, flats and apartments above shops and maybe ex-military homes and government houses have been identified and included into local housing needs? And whilst Medway planners talk up cycling routes and public transport, we all know that for all new developments, the private car is the chosen form of travel being more reliable and for many the only option. This has a knock on effect for our air quality, but let's not forget that during the construction of these houses, rail station and roads, the concentrations of air pollutants will be exacerbated and it seems that no suggestions to reduce this impact has any thought been made to the movement of all these construction materials both arriving on site or the thousands of tons of waste materials being removed offsite being moved by rail and water.

The rural town this plan talks about for Hoo creates many problems, the village has lost its banking facilities and what town can survive without banks. Our stand alone Post Office with sorting office used for the whole Peninsula has gone, along with our Police Station with no local police contact point, what town would you like to live in without a proper police presence. And of course this plan has not included any housing numbers for each of the neighbourhood mentioned making it very difficult for people to get a sense of the scale of destruction of our Peninsula.

School and school places must keep up with all these new developments and new communities as soon as they are planned and NOT after, and these school places must be ring fenced for local children to prevent excessive travel.

The closure of Deangate Ridge Golf Club, a massive social and sporting area, seems to be at odds with improving sports, social facilities and well being. Why was it not recognised that the golf club at the centre of a sports complex and this Peninsula sports and leisure centre should have been imperative? Space around the golf club could include a new swimming pool, indoor sports and fitness centre and these would go a long way to create health and social well being across the whole Peninsula.

Hoo Peninsula has a rich history of agriculture and fruit farming and these fields and orchards should be protected, but over the last few years these are falling to developments and the local plan should protect such areas and the retention of high quality farming land is a priority, once these fields are concreted on it's lost forever. any large scale settlements/developments without any real thought of fresh water which we all know is a finite commodity and the obvious increase

to water consumption will make things so much worse. Are there, any plans to protect surface and groundwater resources? And of course with this extra usage comes extra wastewater and its problems and this is already a major problem here.

Air quality is a major concern, monitoring of air quality seems very minimal and any increase in vehicle transport particularly HGVs will have exacerbate levels of nitrogen dioxide.

Public Transport on the Peninsula is abysmal and the inclusion of a rail service seems to have been added as an afterthought, there is nothing to suggest a bus terminal at the proposed station, therefore encouraging car movements across the peninsula. This will not help air quality, why is there no mention of utilising the rail link to take HGV traffic away from Kingsnorth by having goods transported by train? Why is there no thoughts on river usage around Kingsnorth? Would the remote rural areas of the Peninsula be better served by mini buses to and from a bus hub at the new station or Kingsnorth?

Healthcare is one of the major concerns to people of the Peninsula and it's important that provision of a healthy living centre or other supplementary healthcare facility to take away the constant need for travel to Medway Maritime which is becoming difficult for the elderly and disabled. This would of course take pressure off this hospital. We cannot ignore the fact that the life expectancy for Medway residents is lower than the average for England.

Any encroachment of our villages beyond their present envelopes must be avoided as each and every village of the Peninsula has its own character and green buffer zones between villages that must be preserved. It is with this that comes the problem of developers using the cheaper option of contributing to existing open spaces rather than incorporating new on-site open spaces which they would use for more housing instead. Developers should be encouraged to use distinct character in the developments and not just squeeze as many dwellings on a site, people need to be comfortable with their new surroundings with the inclusion of communal space for all residents this latest virus emergency has proved the need for local food growing by way of more allotments and these should be supported and advice given to developers to create these, especially now that on most developments garden space is limited.

Four Elms Hill is seen as the gateway to the Peninsula and quite often we are promised improvements and now a provision of a relief road, and new and upgraded roads is the latest of these promises, and to be honest I and many residents are skeptical with these latest suggestions which touted in such away that we the existing residents of the Hoo Peninsula can only have access to acceptable roads on and off the Peninsula if we agree to 12,000 extra houses here and like me are incensed by Medway Council plans to that the to concrete over our unique Peninsula at all costs.

These plans for changing Hoo village into a rural town (whatever a rural town now is) are unsustainable.

Ron Sands
Hoo Peninsula Ward Councillor

From: [REDACTED]
Sent: 04 May 2020 11:35
To: futuremedway
Subject: RE: Planning for growth on the Hoo Peninsula

Dear Sir/Madam,

Thank you for your email below, inviting Southern Water to the Planning for growth on the Hoo Peninsula. Southern Water have no comments to add and look forward to being updated with the progress.

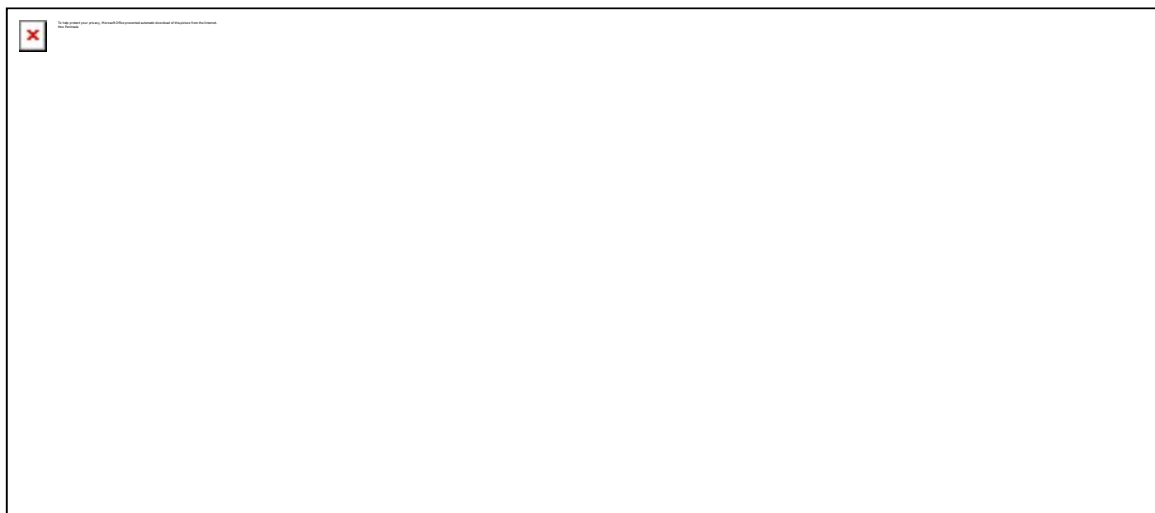
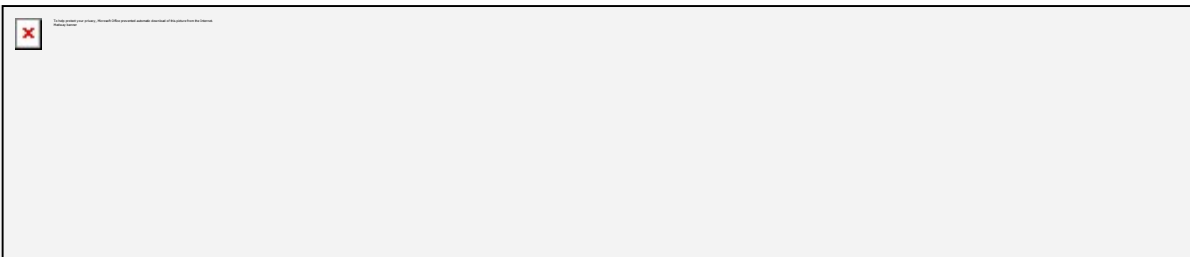
Yours faithfully,

Tamzyn Janes
Regional Planning Lead
Kent and East Sussex

M. [REDACTED]



From: Medway Council [mailto:MedwayCouncil@public.govdelivery.com]
Sent: 06 March 2020 14:52
To: [REDACTED]
Subject: Planning for growth on the Hoo Peninsula



Planning for growth on the Hoo Peninsula

Medway Council has recently secured £170m of funding to deliver strategic transport and environmental projects on the Hoo Peninsula through the [Housing Infrastructure Fund](#). This enables further development in this area that could help to meet Medway's growth needs over the next 20 years. This potential growth could also be an important part of our development strategy for the new Medway Local Plan.

From: Roy Freshwater [REDACTED]
Sent: 03 May 2020 14:14
To: [REDACTED]
Cc: [REDACTED]
Subject: The Planning for Growth on the Hoo Peninsula consultation 2020 - Medway Local Plan - HIF Government Grant £170 million to build 10,600 new homes
Follow Up Flag: Follow up
Flag Status: Flagged

Dear Ms Tolhurst, Congratulations on your new senior positions within Government. Residents are aware the coronavirus may change your government work priorities and much of your time.

Residents appreciate there may be consequential delays by government and local authorities in replying to correspondence, but the Peninsula residents are seeking your urgent help in answering 6 questions set out below.

The answers will enable residents to constructively respond to Medway Local Plan 2035 consultations for planning and managing growth on the Hoo Peninsula that Medway Council is still taking forward in connection with Medway Local plan, a recent closing date is the 11th May.

We hope your senior government position will enable you to speak with Robert Jenrick, Secretary of State for Housing, Communities and Local Government (HCLG) and his team and also Medway Council to get answers to these questions as they have major health consequences for your constituent's.

Residents do not understand and confused why the government has awarded Medway Council a massive £170m House Infrastructure Fund grant for providing forward infrastructure funding towards building just 10,600 new homes (£16,000 per new house built). Medway Council Local Plan does not show this money will provide any direct benefits to local Peninsula residents and is only intended to make new homes built on our green fields and targeted at London commuters more profitable. Only crumbs, if any, funding will be left for necessary additional infrastructure and services needed for local residents. The funding proposals are not viable and do not provide sustainable new housing and will, therefore, be strongly resisted by local people with your support through the independent examination carried out by the government-appointed planning inspector. Residents will also be raising additional questions asking if Medway Council has secret plans that will further destroy the unique and historic Peninsula green agriculture fields and marshland.

Peninsula residents are aware of the housing crisis and that new houses have to be built somewhere but feel that alternative viability tests would support evidenced-based information for HIF investment and the building of new homes and urgently needed regeneration in areas of Chatham, Gillingham, Luton, Borstal and Rainham and periphery areas. Such regeneration and alternative building plans would substantially reduce concerns about increasing pollution in Medway because of established transport links in these areas.

Despite many requests to Medway Council, the Peninsula communities have had no questions answered or information provided confirming evidenced-based information or budgets to support the Local Plan

2035 rural focus scenarios proposing to turn the Hoo St Werburgh village into a small rural village. They have not provided any transparent projections on budgeted monies for ringfenced budgets to support the consequential infrastructure needs of Peninsula village communities. Residents consider it unacceptable that residents are not being allowed access the same evidence-based information and modelling information Medway Council submitted to the government so they can test and comment on the credibility of the bid - even if any sensitive commercial information is blacked out.

You have attended many meeting with local Peninsula residents and therefore aware most of the local communities are against Hoo Village being forced to become a rural town because of past hostility and incompetence of Medway Council towards Peninsula communities. The 2,000 new homes already built on the Peninsula over the past ten years have made lives of Peninsula residents far worse and substantially more unhealthy because of Medway Council constant refusal to make any investments into necessary infrastructure and additional services to make homes sustainable.

Peninsula residents have also lost trust in Medway Council who continue to turn a blind eye to large building developers exploiting planning laws and making minuscule 106 payments and continue to walk away from massive community problems they have created. The trust in Medway Council has been further eroded by the council's Cabinet meeting deciding to keep secret the £7million government grant bonus for new homes built on the Peninsula over the past 10 years instead of investing any of this money in urgently needed infrastructure and additional urgently needed local Peninsula services.

Residents are therefore requesting your help in obtaining answers to the 7 Questions below where information is needed by residents to highlight public health concerns making their lives more unhealthy and reply to Medway consultation documents for the Local Plan 2035 and to go forward on preparing the Neighbourhood Plan.

1 Can you please confirm with Secretary of State HCLG or write to Medway Council on behalf of Peninsula communities asking Medway Council (a) to identify /list the real and evidenced-based infrastructure needs for the Hoo Peninsula communities identified in connection with the development framework to build 10,600 new homes on the Hoo Peninsula as set out in the Local Plan and HIF bid (b) to provide a list of evidenced-based and ring-fenced budgets including information on new services that will be included in the final Local Plan documents showing how much of the HIF grant monies will be directly invested in infrastructure to benefit Peninsula residents and make their lives better?

You will be aware the £170 million HIF grant will turn the Peninsula into one massive building site for over 15 years. The Local Plan fails to set out evidenced-based budgets and phased spending needed for new infrastructure, additional local services, public health concerns or measures to reduce pollution. Presumably, such information would have been provided to government to support the viability of Medway Council HIF bid but Medway Council is now 'Silent' and refuses to share the same transparent information with residents showing action plans to make Peninsula residents lives better and more healthy?

You will also be aware from previous correspondence that 2,000 new homes have already built on Hoo Peninsula over the past 10 years without Medway Council delivering or funding any new physical infrastructure to support new and existing communities and the minuscule section 16 monies have not been anywhere sufficient to meet the infrastructure needs of local Peninsula communities.

Question 2.Hoo Peninsula: Can you please obtain and confirm with Secretary of State HCLG or Medway Council that HIF bid documentation to government included evidenced-based projection /modelling figures agreed with Highways England showing how the A228 Peninsula highway and new roads on the Peninsula will absorb (a) 70,000 increased car journeys per day from 10,600 new homes built - 3,000

additional HGV movements a day from building new commercial business at Peninsula Medway Park, and minimum estimated 2,000 additional car movements per day from Medway towns travelling to park cars and accessing Peninsula new train station. Modelling statistics - projected minimum total of 75,000 car /HGVs movements per day.

Can you kindly confirm that the Medway Council HIF bid documentation submitted to the government included the above important vehicle evidenced-based information and above modelling statistics showing the consequential additional car and commercial vehicle movements generated from building 10,600 new homes and the expansion of Commercial businesses having to use the Peninsula Highway A228? The projected 70,000 additional car journeys per day are based on the rule of thumb planning figure of 7 car journeys per day per new house built. Such additional car journeys alone will overwhelm the current capability of the A228 Peninsula Highway, which has already been declared at full capacity by Highways England. Such vehicle numbers will turn this dual carriageway into one big traffic jam and close it down without even considering additional HGVs movements and cars travelling to new train stations.

You will know Medway Council has completely failed in the last 10 years in persuading existing and new residents to use any alternatives to car-based travel. Medway Council uses glossy local plan magazines with words 'provision of real alternatives to car travel' but the A228 looks like the M25 with snakes of traffic. Local buses mostly run empty as fares are prohibitively expensive and bus services are being mainly used by senior citizens going shopping in Strood and Rochester. It would be an enormous mistake for the Council to promote public transport as an actual way forward to reduce pollution or any real alternative to car-based travel because it will not happen.

Question 3. Spending Programmes for Peninsula Road improvements. Can you please obtain information from Secretary of State HCLG or Medway Council requesting copies of plans submitted with the Medway Council HIF bid showing new roads/improvements of existing roads needed to cope with minimum 75,000 additional Car/HGVs journeys per day along A228 Peninsula Highway and associated measures to reduce illegal levels of pollution?

Can you enquire and confirm if Medway Council HIF bid documentation showed projected funding splits for the massive road expenditure £85.7million HIF grant between the A289 and A228 Peninsula Highway. Peninsula residents are very interested in the design and details of road works tendered and timescales and how plans will be able to absorb additional car/HGVs movements shown in question 2 above and also details of the action plan to reduce pollution at Four Elms Hill AQMA?

Residents have already lost complete trust in Medway Council ability to undertake major road-building works as the Council have started no important roadworks, with many excused, for over the past 4 years in connection with important approved £11 million capital-funded road works at three roundabouts on the A289 that would have substantially improved traffic flows and reduced ever-increasing vehicle pollution particularly in connection with Four Elms Hill AQMA. Peninsula residents also fear that Medway Council will probably give priority to starting road works on the A289 having regard to ever-increasing traffic jams at the present time and the importance of this road in accessing the M2. That A289 roadworks will overspend - HS2 comes to mind - which consequently means plans for the A228 will be substantially reduced and existing illegal levels of roadside pollution and particulates that are avoidable will continue to increase and cause unacceptable harm to Peninsula residents for many years.

Question 4. Major Impact on Peninsula and Local Air Quality - Four Elms Hill Air Quality Management Area: Environmental Assessment of Plans and Programmes Regulations 2004: Can you please write to Secretary of State HCLG or Medway Council to enquire and confirm details of evidenced-based action plans set out in the Medway HIF bid and the Local Plan that will substantially reduce illegal levels of pollution and also put in place an action plan to comply with AQMA legislation.

Residents have lost complete trusts in Medway Council protecting their health as we have seen no action plan being put in place to comply with the AQMA law to reduce the illegal levels of pollution at Four Elms Hill AQMA since it was declared in 2017. For over 3 years Medway Council has been aware of the public health concerns and pollution levels including particulate levels substantially increasing and causing harm to the health of residents who are being forced to travel through increasing illegal levels pollution of this AQMA and associated roads. The A228 and A289 provide the only access and exit routes to the Peninsula. Residents are seriously worried that their health is being compromised by Medway Council completely ignoring and being 'silent' on AQMA legislation when considering a new planning application for the Peninsula and also ignoring the legal requirements of **Environmental Assessment of Plans and Programmes Regulations, 2004** and the impact and cumulative effects of pollution from vehicle numbers are clearly not being properly considered in the draft Local Plan submitted for consultation. Visual inspection alone of the snakes of cars and constant streams of HGVs and belching pollution will confirm the constant dangers to residents health.

Question 5 Medway Council not complying with the law. Can you please discuss with the Secretary of State HCLG or his team actions the government can take to insist Medway Council complies with the following legislation and provides transparent information to Peninsula residents on the dangers of increasing vehicle exhaust pollution being generated from new planning application approved for the Hoo Peninsula? Despite extensive correspondence with Medway Council since Four Elms Hill AQMA was declared in 2017, the Council and Planning Committee has unlawfully continued and refused to make any references or mention the word 'POLLUTION' on any Peninsula Planning Committee reports and the council is 'silent' on the consequential increases in vehicle exhaust pollution being generated from new Hoo Peninsula housing and commercial applications. It can only be assumed that political interference is causing the Planning Committee reports to continue to be 'SILENT' on increasing pollution relating to housing and commercial developments on the Hoo Peninsula for the past 3 years. Residents are asking for a simple reference in the planning committee recommendations, subject to Council legal advice - 'that this planning application will generate x number of additional vehicle movement and have a consequential increase in pollution from vehicle exhaust fumes of Nitrogen dioxide, etc particulates and other pollution and the cumulative effects on vehicle numbers are?

Such reasonable information and public health advice will enable residents to take action to protect their lives, the lives of their family, visitors and business employees. The current actions of the Council are contrary to the Environmental Assessment of Plans and Programmes Regulations 2004, National Air Quality Strategy which expresses a need for the Council to consider air quality for new developments, Environment Act 1995 and Public Health England, requiring the Council to address unacceptable, serious and avoidable pollution causing harm to residents and the Medway Council air quality guidance for developers. It is unacceptable that Medway Council is 'silent' on pollution and hiding behind the results of permanent pollution equipment which is clearly not positioned to provide accurate pollution information or the impact of visible pollution smog along the length of Four Elms Hill subject to the AQMA.

Question 6. Can you please write to Medway Council giving your support to the purchase/lease of a new permanently sited air pollution monitoring station equipment sited within a security cage, subject to professional advice, in the middle of Four Elms roundabout to provide transparent roadside pollution information to Peninsula residents/ Medway Council/ DEFRA and all drivers using the A228 and A289 as part of the Council commitment to 'ensure the new local plan will have a strong air quality policy, supported by Medway Air Quality Planning Guidance '. It will also support and provide evidence that the council action plan will urgently reduce increasing illegal levels of pollution in Four Elms Air Quality Management Area. Subject to consultation the Peninsula residents would support the funding being met from HIF grant or additional Council Tax from new houses built or as a last resort the council asks

Parish Council to contribute to the purchase/leasing of this important equipment to protect the health of residents.

Medway Council makes high profile statements in glossy magazines and letters that the council had 'strong air quality policy' but where has this policy been since Four Elms AQMA was declared in 2017. The council has been 'silent' on all Peninsula planning applications since 2017 and the consequential increases in vehicles numbers and movements causing harm to residents health contrary to the Councils public health duty to protect and care for their residents. Put simply, air pollution is a killer and causes adverse impacts on the general health of the population especially the young, it causes premature deaths and is harming the health of Peninsula residents where pollution links are aggravating heart and lung conditions and there is increasing concerns over 'particulates' where national media have highlighted information and reported high levels of particulates in neighbouring Chatham are causing one in sixteen deaths in Medway.

Medway Council two existing permanent pollution monitoring equipment is not sited correctly to provide any transparent or dependable roadside pollution information to Peninsula residents so that they can take action to protect their health and health of their families. The extra equipment will provide transparent pollution information on nitrogen dioxide, sulphur dioxide and worrying PM2.5 and PM10 and also provided valuable data to both Medway Council and DEFRA at a leasing cost of 20K per year. Residents would also positively support a more proactive action plan and programme for siting diffusion measuring air pollution tubes on the Peninsula to exceed over 100 test per year, subject to consultation, in line with proactive air quality action plans by many other Council who rely on the professional advice of officers for the siting of diffusion tubes on a lamppost without delaying consultations being carried out with local residents. Residents would also support diffusion tubes being part of the Councils wider action plan to reduce pollution at Grain power stations and many new commercial sites on the Peninsula where they're increasingly heavy diesel HGVs traffic and local roads are being clogged by belching vans/HGVs.

Question 7. Peninsula Train Station Car Parks: Can you please write to the Secretary of State (HCLG) and Medway Council requesting information confirming the number of car parking spaces included in the HIF bid that are needed to support passenger numbers and make the train services viable and support the expenditure of £70 million.

It is estimated that far in excess of 1,000 car parking spaces are required to generate passenger numbers to make new train stations viable. That any public transport arrangements from Medway towns to transport passengers to stations will be too slow and residents will choose to use cars. Peninsula communities are concerned that a substantial number of green fields will be covered over with tarmac to provide car parking places. That such open-air parking will turn the Peninsula into another 'EBBSFLEET' with park cars dominating local countryside views and taking the place of wheat and grass field blowing in the wind. Such open-air parking would be contrary to Medway Councils key statements 'to respect and improve green infrastructure for people, would be critical'.

If the new railway programme goes forward can you please confirm your support, subject to local consultation, for the building of multi-storey car parks with green and living plant walls as part of the green infrastructure needs for the Peninsula.

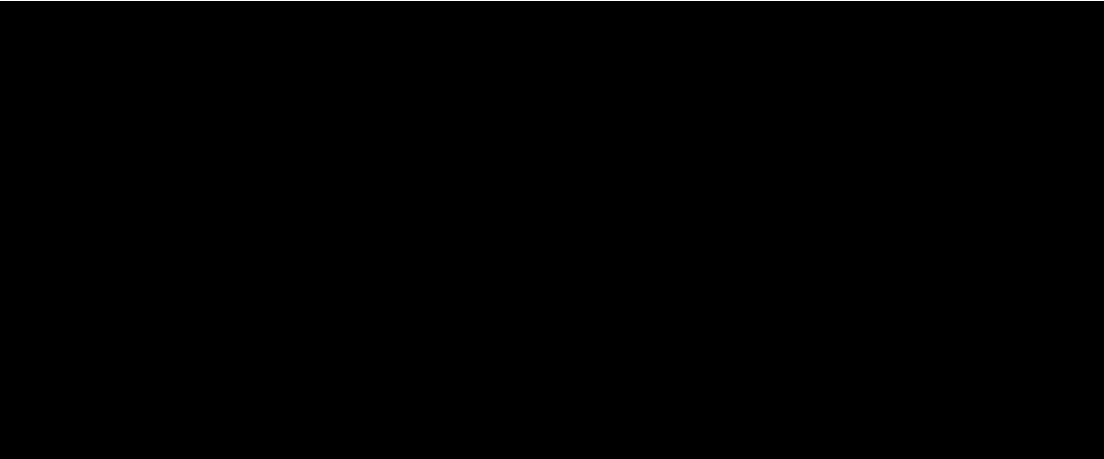
Thank you again for your help in getting replies to these question and we hope your senior position in government will assist you in this connection. Residents would also request that you visit when government current coronavirus advice allows and traffic is back to normal levels our wonderful Grain Beach for a quiet moment from your hectic government jobs. You will then visually see for yourself how the A228 now looks like the M25 with snakes of traffic and traffic jams at Four Elms Hill and permanent haze of pollution. You will see and visually judge for yourself the constant movement of vehicles using the A228 and entering and leaving Peninsula Medway Kingsnorth Business Park - including HGVs from Euromix/Ikea/Amazon and the constant lorry movement collecting extracted aggregates from Tarmac and

other importing company depots at Grain. HGVs movements have also increased serving Hoo Marina commercial business together with housing developers receiving building supplies and earth moving lorries and we have now constant commercial vehicle movement from Deangate - the list goes on.

Medway Council planning committee has not visited the Peninsula themselves and just continue to give planning approval to many new houses and expanding commercial business and despite correspondence continue to be 'SILENT' and completely ignored the consequential increases in diesel HGVs pollution and especially increasing 'particulates' which are causing harm to Peninsula communities health.

Regards Roy Freshwater

Copies sent:



Date: 04 May 2020
Our ref: 311314
Your ref: -



Planning Policy
Planning Service
Medway Council
Gun Wharf
Dock Road
Chatham ME4 4TR



By email only, no hard copy to follow

Dear Sir or Madam

Planning for growth on the Hoo Peninsula

Thank you for your email of the 6 March 2020 seeking Natural England's advice on the 'Planning for growth on the Hoo Peninsula' consultation document. Natural England welcomes the opportunity to engage with this consultation as part of our shared vision to realise a sound Local Plan for Medway.

Natural England in general welcomes the information within the Planning for growth on the Hoo Peninsula report, acknowledging that it is at present limited in detail being a strategic document. We would support more detail coming forward through the Local Plan process building on the work being undertaken as part of the cumulative ecological impact assessment for the development options on and around the Hoo Peninsula and the wider Isle of Grain.

The Local Plan and supporting cumulative ecological impact assessment should guide the growth and associated infrastructure allocations to ensure that the 'avoid, mitigate, compensate' hierarchy in the National Planning Policy Framework (NPPF) is followed, thoroughly considering alternatives with no or a lesser impact. We recommend that the Local Plan should allocate growth options which avoid impacts to the natural environment in preference to those requiring mitigation or compensation measures to be implemented. In addition to avoiding impacts, the options for growth should reflect the requirements of the NPPF and the emerging Environment Bill to achieve a net gain for biodiversity.

Vision

In terms of the vision for Hoo St Werburgh, we would support a much greater emphasis being placed on the rich natural environment in which the Hoo Peninsula lies. If the vision of truly sustainable communities is to be realised, the natural environment should be at the heart of the vision and the development proposals should include significant corridors of high quality, semi-natural greenspace embedded throughout the new communities for people and wildlife. The vision at present suggests that by 2037 Hoo St Werburgh will be a thriving rural town 'surrounded' by well maintained and accessible habitats – as part of Medway's green infrastructure strategy these natural areas should be extended to form a network linking through the developments reconnecting the landscape for people and wildlife to thrive.

Opportunities and constraints

Whilst it is noted that the Constraints Plan on Page 6 of the document is schematic, the boundary of the Medway Estuary and Marshes Site of Special Scientific Interest (SSSI) does not reflect that, in general it follows the mean high water mark, in this area. The SSSIs on the Peninsula are a significant conservation resource supporting a wealth of species in addition to the habitats and species for which they are notified. Rather than being considered a constraint, they are a significant asset and opportunity for Medway to undertake truly landscape scale conservation, if the proposed

allocations at Hoo St Werburgh proceed. Opportunities for connecting woodland/scrub habitat for breeding birds, providing habitat corridors for the many species of bats and invertebrates on the Peninsula and creating wetland habitat are all opportunities the designated sites offer to feed into a landscape scale conservation strategy. These in turn, if sensitively designed will provide significant health and wellbeing for residents whilst also helping to alleviate the recreational pressure to the designated sites.

Similarly, whilst we acknowledge that the Opportunities plan on Page 7 is schematic, significant areas of development appear proposed in close proximity to designated sites, including Chattenden Woods and Lodge Hill, Medway Estuary and Marshes, Tower Hill to Cockham Wood and Northward Hill Sites of Special Scientific Interest (SSSIs). Opportunities to buffer the designated sites through the provision of areas of natural greenspace for managed recreation, for example through the creation of country parks, may help to mitigate impacts to the SSSIs whilst also providing opportunities for access, recreation and wildlife.

Design Principles

Principle 1: A landscape led development

Natural England supports the landscape led approach which should ensure that, through the evidence base and cumulative ecological impact assessment associated with the Local Plan, developments (and their associated infrastructure) which avoid impacts to the ecological assets are those which progress to allocation.

Similarly, whilst Natural England is supportive of people having access to the natural environment, this can result in impacts and will need to be carefully managed through the provision of avoidance and mitigation measures as part of the Strategic Environmental Management Scheme (SEMS). We will of course be pleased to work with the Council on the measures to be included within the SEMS to realise the ambition for a sustainable Plan.

Whilst the Green Corridor plan on Page 7 is understandably strategic in nature at present, in addition to the large scale green corridors, high quality green infrastructure should be fully integrated throughout the Hoo Peninsula development proposals providing green linkages through the residential areas. Again, we would be pleased to work with the Council on these measures in the near future.

Principle 2: Access and movement

Natural England is generally supportive of enhanced cycling and walking routes as part of a sustainable development strategy. Any transport infrastructure associated with site allocations that proceed at Hoo should ensure that direct and indirect impacts to designated sites do not result from any road, cycle or footpath provision.

Principle 3: Vibrant and sustainable neighbourhoods

Natural England has no specific comments to make in relation to Principle 3 other than those made elsewhere in relation to avoiding impacts to designated sites and the provision of green infrastructure throughout the neighbourhoods linking to the wider landscape.

Principle 4: An attractive and tailored built form

Natural England welcomes the commitment to sustainable design in the built environment and would also suggest that this includes measures to reduce water consumption to minimise impacts to wetland designated sites. The built environment also has significant opportunities to incorporate features for wildlife through the provision of green and brown roofs and the provision of nesting and roosting opportunities for birds and bats, for example. Innovative design and the use of nature based solutions can also help mitigate the impacts of climate change in urban areas which should be fully explored through the Local Plan process.

Neighbourhood Characters

Village living in Chattenden

The indicative neighbourhood character for Chattenden shows new transport routes and development areas which appear to lie within/in very close proximity to the boundary of the

Chattenden Woods and Lodge Hill SSSI. Natural England would expect any development in this area to demonstrate that all direct impacts are avoided and indirect impacts are avoided or fully mitigated. Such indirect impacts are likely to result from cat predation, noise, lighting, increased recreational pressure and general urbanising effects, for example. If the site is to proceed to allocation, a significant buffer to the SSSI is likely to be required and any allocations should be guided by the results of the cumulative ecological impact assessment.

Parkland living in Deangate

Given the proximity of the site at Deangate to the Chattenden Woods and Lodge Hill SSSI, Natural England would expect any development around in this area to demonstrate that all direct impacts are avoided and any indirect impacts are avoided or fully mitigated. Such indirect impacts are likely to result from cat predation, noise, lighting, increased recreational pressure and general urbanising effects, for example. If the site is to proceed to allocation, a significant buffer to the SSSI is likely to be required and any allocations should be guided by the results of the cumulative ecological impact assessment.

Rural town living in Hoo St Werburgh

Natural England recommend that even in the higher density urban areas, including those proposed at Hoo St Werburgh, green infrastructure and nature based solutions to mitigate the effects of climate change should be an integral component of urban design.

Riverside living in Cockham Farm

Given the proximity of this area to the Medway Estuary and Marshes SSSI, Special Protection Area (SPA) and Wetland of International Importance under the Ramsar Convention (Ramsar Site) along with Tower Hill to Cockham Wood SSSI bespoke measures to manage recreational disturbance will be required. The provision of a country park, if sensitively designed, could be a key component of this but we note that the indicative plan on Page 16 shows proposed access connections to the coast. We recommend that measures to provide residents with a high quality, semi-natural greenspace without direct linkages to the coast should be a key component of the package of mitigation measures proposed. We will of course be pleased to work with the Council on the detailed measures required.

Contemporary living by the new rail station

As with the Hoo Rural Town, Natural England recommend that even in the proposed higher density urban areas, green infrastructure and nature based solutions to mitigate the effects of climate change should be an integral component of the urban design.

Village living in High Halstow

Given the proximity of the site to Northward Hill SSSI, any proposed allocation will need to ensure that impacts do not result. Significant green infrastructure and landscape scale habitat connectivity for a number of species groups exist around High Halstow linking back to Chattenden and the wider Hoo Peninsula and it would appear appropriate for these to be more fully reflected throughout the document.

A thriving employment hub in Kingsnorth

Kingsnorth is situated in a rich environmental setting being surrounded by the Medway Estuary and Marshes SSSI, SPA and Ramsar Site along with the Medway Estuary Marine Conservation Zone. Any allocation proposals should ensure that direct impacts are avoided with any indirect impacts being avoided or fully mitigated whilst also seeking opportunities to further the conservation of these sites. Sustainable design should also be encouraged, for example through the incorporation of brown roofs to support invertebrate assemblages for which this part of Kent is important.

I hope these comment are helpful, we would be happy to comment further should the need arise but if in the meantime you have any queries please do not hesitate to contact us. For any queries relating to the specific advice in this letter only please contact me on 0208 0266 064 or by email to sean.hanna@naturalengland.org.uk. For any new consultations, or to provide further information on this consultation please email consultations@naturalengland.org.uk.

Yours faithfully



Sean Hanna
Senior Adviser
Sussex and Kent Team

Ref:

Planning for Growth on the Hoo Peninsula Response Form

This response form has two parts to complete below.

Data Protection

Personal information gathered on this form will only be used for planning policy purposes and will be held in accordance with the requirements of the Data Protection Act 2018. Your contact details will be **kept confidential** but your comments will form part of the public record of the consultation and published on the council's website. Please address any questions or requests regarding our data processing practices to planning.policy@medway.gov.uk.

Details about how your information will be held and used are found on the link below:
https://www.medway.gov.uk/info/200133/planning/714/planning_service_privacy_statement

Part 1 – Your Details

Name: Martin Simmons MA DipTP MRTPI(ret'd)

Name of organisation (if applicable): In retirement I retain professional interests and am a member of a network which examines the strategic planning relationship between London and the wider south-east, my particular focus being that between London and Kent.

Address: [REDACTED]

Email: [REDACTED]

Phone: [REDACTED]

Ref:

Part 2 – Your Response

- This public consultation proposes a vision for growth on the Hoo Peninsula.
- The vision should help to make it clear what we want to achieve. It should be clear, realistic and locally distinctive.
- The vision is important because it will guide the objectives, policies and design principles.

The proposed vision is:

By 2037, Hoo St Werburgh will be a thriving rural town, sensitively integrated into the extraordinary landscape of the Hoo Peninsula. A valued place providing homes, jobs and services for vibrant communities. A small town with an attractive choice of travel connections. A place built for the future, and respecting the past.

1. Do you get a clear sense of what the Hoo Peninsula will be like by 2037?

Yes ☒

No ☐

Comments: Yes, the objectives seem well set out

2. Does the vision describe the Hoo Peninsula as opposed to anywhere?

Yes ☒

No ☐

Comments: Yes, the particular sense of 'place' seems clear

3. Does the vision reflect your priorities?

Yes ☐

No ☐

Comments: Partially. My concern is that it should focus on the housing and infrastructure needs of the Medway area. See comment under 6 below.

4. Is it concise and easy to understand?

Yes ☒

No ☐

Comments: It seems so to me, as a planner!

5. How can we measure success of achieving the vision?

Comments: By taking steps to ensure that the 29,500 new homes to be provided by 2035 meet the assessed housing requirements for Medway. There is a danger that the scheme would be attractive for migrants from London: see comments on 7 below.

6. Can you set out a better vision for growth on the Hoo Peninsula? Please tell us: see comment on 5 above.

Ref:

- 7. Please use the space below to make any other comments on the consultation document:** My concern relates to the provision in the Housing Infrastructure grant of £63 million for passenger services from a new station at Sharnal Street as part of the scheme. While I accept the principle of this, I note that it is seen as connecting Hoo to London terminals (via Gravesend); this would include the fast 'Javelin' services to London St Pancras. This would make the Hoo development attractive to Londoners moving out in search of housing at significantly lower cost than that prevalent in London, to the detriment of Medway's own housing need. There is a reference to the rail services serving Strood, but how this occurs needs to be made clear, e.g. by the inclusion of an east-facing chord at Hoo Junction to allow a direct service serving Strood and other stations in the Medway urban area, so that Medway as a whole benefits from the rail project.