

Reference	Name	Organisation	On Behalf of
HDF 41	David Thornevell		
HDF 42	Ian Werner	Tetlow King	
HDF 43	Andrew Wilford	Esquire Developments	
HDF 44	Nicky Britton Williams	Kent Wildlife Trusts	
HDF 45	Dennis Adey		
HDF 46	Paul Buckley	CPRE Kent	
HDF 47	Michael Birch	Rapleys	Ac Goatham & Sons
HDF 48	Peter Williams		
HDF 49	Jo Brown		
HDF 50	Lucy Willford	Barton Willmore	Uniper

Catherine Smith,
Planning Manager - Policy
Medway Council,
Gun Wharf,
Dock Road,
Chatham Kent

8.4.2020

Dear Ms Smith,

Consultation - Planning for Growth
on the Hoo Peninsula

A friend has passed me your circular letter of 5th March.

I would have come over to see the exhibitions but the website shows these were cancelled.

I did try this morning to access the leaflet but could not get in.

As someone who walks sometimes on the Hoo Peninsula I do hope any plans to expand Hoo or the villages take into account the


The need to keep a good system of public paths and open spaces & recreational areas. As the current position shows there is a need for places for people to have these close to new housing.

There is also the Coastal Path being created & its existence should in my view be recognised in my local Plan. Especially as there are gaps in the current path along the coast between Grain & Allhallows.

I also think with the exhibitions cancelled consideration should be given to extending consultation periods so those without computers are not excluded.

Coupled with this all Councils should put pressure on the Government not to penalise councils for delays in submitting draft Local Plans while the "lock down" continues.

Yours sincerely



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:

IAIN WARNER

Name of organisation (if applicable):

TETLOW KING PLANNING

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: While the vision for growth is set out there are still, in our opinion, too many technical uncertainties relating to the actual delivery of the vision as well as the lack of realistic timeframes to see the delivery of the vision.

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?

Comments: The most obvious measure is to consider whether or not the vision is capable of being delivered in an appropriate timeframe and with the necessary infrastructure provision in place. Our technical review of the proposal in support of these comments sets out our view on the matter of infrastructure provision.

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:

Please refer to the attached technical review of the infrastructure proposals relating to rail capacity.

PROPOSED STATION AT HOO – INITIAL DESKTOP REPORT

Authority & Brief

On 13 April 2020 Robert Skene Consulting (Ltd) was appointed by Odyssey Consult (OC) to undertake an initial desktop study into the likely feasibility of providing a new railway station on the Grain Branch at Hoo, close to the site of the former Sharnal Street Station, the rail service which might be provided to it, and the likely impact on other rail services. In addition, RSC was required to produce a set of questions which it is considered reasonable for promoters of the scheme to be able to answer.

Specific requirements of the brief were to briefly consider the following, at an initial desktop level of detail:

- consider where the terminus might be located on the Grain Branch, including consideration of Hoo, reinstatement of the alignment to Allhallows-on-Sea, extension to the village of Grain, or some other point on the existing alignment in the Isle of Grain;
- service options;
- operational considerations, including North Kent Line capacity, enhanced use of Hoo Junction, Gravesend stations, and freight use of the Grain Branch;
- whether a terminal station at Hoo could be compatible with freight use;
- potential financial and economic viability;
- engineering implications;
- signalling;
- station(s): where might they be located and what facilities would be required;
- is a Train Operating Company likely to serve the station.

Current Rail Infrastructure

The Grain Branch is a single track freight-only railway with basic infrastructure which leaves the North Kent Line (NKL) at Hoo Junction, some 5.35 km East of Gravesend Station. Naturally, the Up Direction is towards Hoo Junction, and the Down Direction is towards Grain.

There are both facing and trailing crossovers on the Gravesend side of the junction. Hoo Junction is a flat junction, thus Up services leaving the Grain Branch need to cross the NKL Down Line. There are extensive freight sidings at Hoo Junction on both the Up and Down sides of the NKL, and a reception loop and runround on the Up Side, with shunt necks.

The length of the branch between Hoo Junction and the boundary with DBS (the FOC¹ responsible for infrastructure beyond this point) is just beyond Grain Crossing LC, at 17.85 km, but the line continues further to the *BP Sidings* (connected directly to the reception sidings at Grain), *Thamesport Freightliner Terminal* (c1.56 km beyond the boundary), and the *Foster Yeoman Terminal* (c1.87 km beyond the boundary).

A private siding serving Brett Marine leaves the Branch at Cliff Ground Frame, some 2.35 km from Hoo Junction. A trap point on the private siding protects the Grain Branch. In addition to these, Marcroft Engineering operates a wagon repair and maintenance facility at Grain.

The Grain Branch is classed by Network Rail (NwR) as having *RA7* Route Availability and *W6* gauge. The former is a little surprising as copies of older *Route Directories*, issued by both Railtrack and NwR in RSC's possession indicate that the Branch has an *RA10* Route Availability, a figure that is more appropriate for bulk freight trains. Given that NwR has an obligation to maintain the infrastructure to at least the capability inherited by Railtrack on 1 April 1994, the latter figure should be assumed. Route Directories indicate the gauge as *W6A/B* (i.e. with a corner gauge exemption for containers), this is still somewhat of a limitation for container traffic from Thamesport, given the growth in hi-cube containers, which exceed this loading gauge on conventional container wagons. However, all Route Availabilities and gauges are acceptable for any passenger rolling stock that is likely to use the line. It is not believed that any current rolling stock used by Southeastern has official gauge clearance for the Grain Branch, but RSC considers that obtaining this should be little more than a formality.

The line is subject to a 40 mph line speed limit but the connection and facing crossover at Hoo Junction are subject to a 20 mph permanent speed restriction (psr) (the trailing crossover has

¹ Freight Operating Company.

a 15 mph psr, but this crossover is not relevant to the proposal). Approach speed limits are also enforced on all but one of the six level crossings on the branch, as follows:

Wybourne LC	(AOCL ²)	15 mph, in either direction
Stoke Creek LC	(UWC ³)	15 mph in Down Direction & 20 mph in Up Direction
Recreation LC	(UWC)	None
Middle Stoke LC	(UWC)	35 mph in Up Direction
Stoke LC	(ABCL ⁴)	35 mph in Down Direction & 25 mph in Up Direction
Grain LC	(MCG ⁵)	35 mph in the Down Direction

Only Wyborne LC is located between Hoo Junction, and the location of the proposed station. Stoke LC appears to have been replaced by an overbridge and consequent road realignment recently, and thus no longer appears to be relevant.

The Grain end of the Branch is reached by passing through flood protection gates, some 17.32 km from Hoo Junction, thus the terminals at the end of the Branch are outside the flood protection zone. There is an approach speed limit of 25 mph to these, in either direction.

The Grain Branch is not fitted with track circuit block working, as would be required to operate a passenger service. Instead, it has basic signalling only, the single line is divided into two single line sections: Hoo Junction to Cliffe, and Cliffe to Grain. Hoo Junction to Cliffe is controlled by *Ashford Area Signalling Centre* (Ashford ASC), while Cliffe to Grain is worked by a token system, with token instruments at either end of the section. In itself, the token system would be suitable for passenger use, but only if signalling on the Hoo Junction to Cliffe section met passenger standards. AWS⁶ is only provided at signals with NK signal numbers (i.e. those at and protecting Hoo Junction and *Signal NK509*, protecting the private siding at Cliffe in the Up Direction. None of the signals on the Branch appears to be fitted with TWPS⁷, as would be required for passenger operations. Permissive working between Hoo Junction and *Signal NK509* is prohibited.

² Automatic Open crossing Controlled Locally.

³ User Worked Crossing.

⁴ Automatic Barrier crossing Controlled Locally.

⁵ Manually Controlled Gates.

⁶ Automatic Warning System.

⁷ Train Protection Warning System.

The area is controlled by Ashford ASC, local interlockings are provided at Gravesend and Hoo Junction. RSC is aware that there is limited spare capacity available within the Solid State Interlocking (SSI) at Hoo Junction (*Interlocking NH*), and does not believe that there is sufficient capacity available within the present SSI to signal the Grain Branch to passenger train standards. RSC acted as lead rail consultant for the new rail terminal at Northfleet, opened in 2012. In planning it, it was found that there was insufficient capacity within the Gravesend SSI (*Interlocking NG*) to accommodate both the new connection to Northfleet Terminal, and the remodelling of Gravesend Station (undertaken in 2013). In consequence, the interlocking boundary between Gravesend and Hoo Junction was moved towards Gravesend, to transfer functions from Gravesend SSI to Hoo SSI; this released the necessary capacity at Gravesend, but left little spare capacity at Hoo Junction, or indeed in either SSI. It is believed that the remodelling of Gravesend Station subsequently released modules within the Gravesend SSI, but that this gain was modest, and certainly insufficient for major additional signalling works⁸.

The Grain end of the branch is controlled from the *Grain Crossing Signal Box*, this is a mechanical box with a, small, 9 lever frame, and dates from the construction of the Branch in 1882. In addition to Grain LC, and the siding access at Grain, this controls the single line between Cliffe and Grain, while the portion of the Branch between Hoo Junction and Cliffe is controlled by Ashford ASC. RSC believes that the boundary between Ashford ASC and Grain Crossing SB occurs at Cliffe Ground Frame. Traditional semaphore signalling is provided at Grain at protect the level crossing, including a fixed distant signal, this is of Southern Railway (1923-1947) pattern: based on experience elsewhere, were a regular passenger service to be extended this far RSC considers that NwR would insist on resignalling with modern colour light signalling controlled by a digital interlocking from Ashford ASC.

The junction with the private siding to Brett Aggregates at Cliffe is controlled by a mechanical ground frame located at its junction with the Grain Branch (*Cliffe Ground Frame/Cliffe GF*). RSC believes that tablet instruments for the Western end of the section of the line between Cliffe and Grain is located here, and are traincrew/shunter operated. RSC further believes that the ground frame is operated using using key token release, and in consequence, trains on the private siding are 'locked out' into it, enabling other trains to use the Branch. The tablet release

⁸ The issues are exacerbated by the 'Module 63 problem' in the SSI used, which prevents the use of this slot for safety/reliability reasons, in addition, Module 1 is used for SSI internal functions, and others are used for interlocking proving purposes. There are 64 module slots in each SSI, and many of the modules will only control a single signal, or a signal and a set of points.

is controlled via an interface with Hoo Junction SSI: the release functions being part of the same module that controls signal *NK509*. There is not believed to be any accommodation for a shunter or signaller at Cliffe GF.

All trains need to stop at Cliffe GF to either pick up or return the tablet for the Grain end of the branch. Typically, the *Working Timetable* (WTT), has allowances for each train of 3 minutes in the Up Direction, and 2 minutes in the Down Direction to exchange tokens/tablets. It should be self-evident that this loss of time, especially when coupled to the time that would also be taken to decelerate to a stop, and accelerate back to up to line speed again, would be problematic for a passenger train service that needs to have a journey competitive with other modes. The only way of speeding this system up, other than complete replacement of the signalling system, would be to provide a cabin over the tablet machine, and permanently man it, enabling tablets to be exchanged by pouch, with the train slowed to walking pace.

The Grain Branch is not electrified, nor has it ever been. Nor is there any electrification of Hoo Junction Sidings or Reception Siding⁹. The NKL is electrified using the 750V dc third rail system.

As noted above, the proposed new Hoo railway station would be located close to the site of the former Sharnal Street Station, this was some 7.84 km from Hoo Junction.

The final passenger service over the Branch (see below) operated as a shuttle between Gravesend and Allhallows-on-Sea. This terminated in either Platform 1 or Platform 2¹⁰ at Gravesend Station, its use being facilitated by the platforms being located on loops clear of the main running lines, with through lines running through the middle of the station, enabling through trains to bypass trains terminating at the station¹¹; however, as a part of the remodelling of Gravesend Station, the ability to terminate trains arriving in the Up Direction (i.e. from the East) was lost. Instead a new through platform was constructed on the site of the through lines (now designated as *Platform 1*), while the original Platform 1 (now *Platform 0*) configured for

⁹ At one time they were fitted with the rare 600V OHLE system for electric freight locomotives, but this was removed at least forty years ago.

¹⁰ Written accounts state that Platform 2 was used, but there is abundant photographic evidence of Platform 1 being used as well.

¹¹ However, between duties, the push-pull service employed latterly, was sometimes either berthed in the Up Bay platform, at the London end of Platform 1: a somewhat awkward movement from Platform 2, or was shunted onto either the Down Through line or the Up Through line to allow other trains to call at the station.

terminating trains arriving in the Down Direction only, although NwR's Sectional Appendix does indicate that the Platform 1 (only) is configured for bi-directional working.

It does not appear that, for practical purposes, it would be possible to reconfigure Platform 0 at Gravesend to accept trains arriving from the Grain Branch. This is because the need for the new Platform 1 to accommodate twelve car trains has resulted in it being constructed across the position of the former crossover between the old Platform 1 and the Down Line at the Hoo Junction end of the station. Any new crossover would therefore need to be constructed further to the East, in turn, this would entail widening the covered way over the alignment at Railway Place/Stone Street. Not only would this be a major civil engineering undertaking, and very disruptive, but would also necessitate demolition of the historic building located above. Furthermore, as noted above there is little spare capacity in the Gravesend SSI, and certainly not enough to signal Platform 0 for trains arriving in the Up Direction, and those departing in the Down Direction, as well as controlling and protecting the new connection to the Down Line that would be required.

Similarly, Platform 2 could not return to being a terminal platform for Grain Branch trains as the loss of the former through lines would make this a timetabling impossibility. A further issue is that, as noted above, the existing Gravesend SSI is likely to have insufficient spare capacity to install either the necessary reversible signalling, or to control the new facing crossover that would be required at the Hoo Junction end of the station layout: this would take less SSI module capacity than the option above, but it is still likely to be more than the spare capacity available.

Historic Background

The Grain Branch has a somewhat convoluted history. It was opened by the South Eastern Railway (SER) in 1882, to provide ferry services to the Continent from Port Victoria (a pier on the River Medway at the eastern end of the peninsula at Grain)¹², originally having been promoted and construction started by a nominally independent company. This was

¹² This concept stemmed from complex factors, driven by the excessive competition between the SER and the rival London Chatham & Dover Railway (LCDR). In simple terms, a receipt pooling arrangement had been reached for continental traffic via the Channel Ports, in a rare moment of rapprochement. The LCDR later sought to circumvent this by introducing a ferry service between Queenborough Pier and The Netherlands, which was outwith the pooling agreement. The construction of Port Victoria was the SER riposte. The essential point is that the line was constructed through blinkered commercial antipathy, rather than a dispassionate view of financial viability. Once the SER and LCDR had been (effectively) forced to merge by their disgruntled shareholders in 1898 the purpose of the Hundred of Hoo Railway (and the Queenborough Pier service) disappeared.

commercially unsuccessful, with a vestigial passenger service lingering on to 1951 (being cut back to a new station at Grain thereafter), carrying oil refinery workers at shift times, some years after the remains of the pier had been demolished, and fifty years after ferries had ceased to run. It was originally styled *The Hundred of Hoo Railway*, and was built at minimum cost by the, increasingly financially crippled, SER and the under-capitalised original private company, and was lightly engineered as a result. It had a single-track formation, and is still thus.

The commercial failure of the passenger service led to initiatives to develop freight traffic, by establishing industry on the Hoo Peninsular; this was more successful: various industries, and freight sidings have come and gone over the years, which continues to the present day, and provides the reason for retention of the line.

In 1906 six halts were opened in search of more passengers. Further efforts were made to stimulate passenger traffic on the Hoo Peninsular by the Southern Railway, which opened a 2.81 km spur, leaving the Grain Branch at Stoke Junction, to Allhallows-on-Sea in 1932, which it hoped to develop as a holiday resort, and commuter town. A period advertising poster to promote it, produced by the Southern Railway is reproduced alongside, this was part of an energetic publicity campaign to promote the resort. While initially successful, despite the bankruptcy of the developer due to failure of houses to sell, increasing car ownership after the Second World War, coupled with the limitations imposed by the constraints of the railway infrastructure, and rising public expectations for the quality of resorts and places to live, resulted in traffic dwindling to a low level quickly. All passenger services

were withdrawn in December 1961: the railway failing survive even long enough to become a victim of the 'Beeching Cuts'.



Passenger services to Grain Station ceased at the same time.

Existing Rail Services

On a typical midweek day¹³, there are a total of between 43 and 47 timetabled freight paths to and from Grain and a total of between 22 and 24 to and from the Brett Marine Terminal at Cliffe, a maximum total of 71. This, however, grossly overstates the number of freight services that actually operate, as freight trains operate flexibly, in accordance with demand: paths are required to all possible destinations, and to cover the maximum supply envelope for each. The reliability with which services operate varies considerably with the type of train: intermodal trains, such as those from Thamesport, can be expected to run dependably (in normal circumstances), in contrast trains of construction materials, such as those from the Foster Yeoman aggregate import terminal, and the Brett Marine dredged aggregate reception terminal, run erratically, driven by the vagaries of the construction industry.

Efficient use of limited capacity on the national rail network dictates that excessive provision is not made for trains that do not run. In consequence, freight trains that run infrequently are often allocated *Q Paths*, these are conditional paths, that depend on other trains not running; sometimes several trains will share the same the same path, of which only one can run. NwR's timetable database indicates that the overwhelming majority of trains on the Grain Branch run to *Q Paths*, for example, Monday to Friday there are four *Q Pathed* empty trains scheduled to arrive at the Foster Yeoman terminal at Grain at 00.08½h, from Harlow, West Thurrock, Ferme Park, and Purley: clearly only one of these can run on a particular day. If one takes out services that are obviously mutually exclusive, this reduces the maximum number of daily freight trains to 24 Up and 25 Down trains (on a Wednesday)¹⁴.

The current Coronavirus crisis has resulted in a major reduction in the number of trains operated, while the publicly available access to the NwR timetable only extends for fourteen

¹³ Note that there appear to be more viable paths allocated in the Down Direction than in the Up Direction, and while the number of Up and Down trains does not necessarily need to balance on any one day, over time they need to; accordingly, the number of viable Down paths has been reduced slightly herein from the maximum value, to reflect the feasible maximum.

¹⁴ Freight traffic tends to be at its busiest between Tuesdays and Thursdays. Mondays tend to be particularly quiet as a result of few incoming trains arriving in the morning, after the weekend. Therefore, it is almost always best to examine peak freight use by looking at Tuesdays, Wednesdays, Thursdays, and (sometimes) Fridays.

days in arrears. Therefore, it has not been possible to report the precise number of trains that operate under normal circumstances. Over the seven day period between 8 and 14 April 2020, a total of just 27 trains ran. Published sources indicate the normal level of service to be around the one train per hour level, which has therefore been assumed herein.

Freight train operations are less permanent than passenger operations: the need for particular commodities, and the fortunes of particular companies change over time, and thus freight flows can dwindle and disappear, while new ones materialise. Accordingly, it is the future freight trends that are pertinent to any passenger operation on the Grain Branch, which of necessity would take several years to implement, rather than current or historic freight traffic trends. Naturally, future demand projection is fraught with error; nevertheless, all four of the current freight terminals on the Branch appear to have clear trajectories:

Foster Yeoman: this terminal has the greatest number of timetabled trains on the Branch at present, importing aggregate¹⁵. A number of the major mainland sources of crushed rock aggregate are reaching the end of their natural lives (East Midlands, Mendip Quarries, etc.), and successive Governments have shown no strategic vision for their replacement; therefore, by default, increasing quantities of crushed rock aggregate will need to be imported, whether from the Foster Yeoman (FY) quarry at Glensander in Scotland, or from Norway. This is particularly true of London and the South East, which has almost no sources of crushed rock. It therefore appears inconceivable that rail tonnages from the FY import terminal at Grain will decrease, indeed the opposite is likely. Fluctuations from year to year are inevitable, as demand is driven by the level of activity in the construction industry, which in turns tends to be driven by the economic cycle.

Brett Marine Aggregates: this terminal has the second greatest number of timetabled paths on the Branch, it imports aggregates marine dredged aggregates, understood to be dredged from the Thames Estuary. Given the lack of crushed rock in the South East, the extraction of sands and gravels is important at a regional level, and given the planning difficulties, and the limited life of individual sources, it is a constant struggle for aggregate companies to keep up with demand. Thus, it appears unlikely that rail tonnages from this terminal would decrease in the foreseeable future.

¹⁵ In essence, there are four types of aggregates: sands, gravels, crushed rock (of various grades), and secondary aggregates (recycled materials, which limit the need for primary aggregates). All of these have specific uses.

Thamesport: the importance of Thamesport has declined dramatically in recent years: twenty years ago it was one of the UK's five main deep sea container ports, now it appears to be 'hanging on by its fingernails'. This has been driven by a number of factors, and not just the emergence of the major new intermodal port at Thames Gateway. One factor was the volume-driven cost structure of intermodal port and terminal operation, where the strong grow stronger and the weak dwindle: Thamesport never managed to develop the critical level of traffic needed to challenge the duopoly of Felixstowe and Southampton, who were able to use their advantage to significantly increase market share in an expanding market, squeezing out the smaller players. The lack of gauge clearance on the NKL for the increasing number hi-cube (9'-6") containers, on standard wagons, was a further factor. It is possible to postulate two alternate futures for Thamesport: one in which it ceases operations, and the other in which it continues as a small feeder port serving the South East corner of England. Neither offers much future for a rail service. However, only a vestigial rail service Thamesport remains in any event: just nine trains per week are timetabled to and from the terminal, thus closure of the terminal would make little difference to the overall level of freight activity on the Branch.

BP: refining activity on the Isle of Grain ceased in 1982, as part of the progressive decline in UK refining capacity, since when it has acted as a storage terminal. A mixture of pipelines and product swaps between the majors has decimated oil by rail traffic over the past fifty years, leaving only a small rump of traffic that cannot be moved by pipeline, mainly bituminous traffic, and low volume off-pipeline flows. In consequence, only eighteen trains per week, and a maximum of three trains per day are now timetabled to and from Grain oil storage facility, and fewer still are likely to actually run. The notable feature of the oil traffic is that it is a seven day per week operation: only these trains and a single Brett Marine train run on Sundays, although this would be the least critical day of operation for a passenger service, due to the general reduction in the number of trains operated on the national rail network on this day.

From the above it can be deduced that the current level of freight activity on the Grain Branch appears unlikely to decrease, and, if anything, is likely to increase.

The following booked train timings on the Grain Branch in daytime are typical:

Grain (Old Station) to Hoo Junction (intermodal)	29 minutes
--	------------

Grain (Old Station) to Hoo Junction (bulk)	36 minutes
Hoo Junction to Grain (Old Station)	25 minutes
Signal NK509 (dep) to Hoo Junction (intermodal)	7½ minutes
Signal NK509 (dep) to Hoo Junction (bulk)	9 minutes
Hoo Junction to Signal <i>NK509</i> (arr)	4 minutes

Note, it is to be expected that booked timings are longer in the Up Direction, due the need to apply a junction margin at Hoo Junction; in the early hours of the morning there is much less need for a junction margin, and thus the Up and Down timings are more closely matched. It is also to be expected that intermodal trains are timetabled to be faster than bulk freight trains, and have better performance characteristics, even though the TOPS codes indicate that the intermodal services to Thamesport operate to *Class 6* timings, rather than the *Class 4* timings that one would expect.

The NKL has an intense passenger service in the morning and evening peak, particularly on the approaches to London, where it can be assumed that no capacity for another regular service exists. But, as a broad generalisation, the available capacity increases progressively as one moves further from London. Indeed, there appears to be spare capacity between Gravesend and Hoo Junction.

Standard operating practice on Southeastern is to have a regular service pattern, operating at the same minutes past each hour in the off-peak period, but with additional trains, and a less regular time interval pattern, in the peaks. Gravesend Station currently enjoys the following off-peak service:

Victoria – Gravesend (stopping)	2 per hour	Terminates
Charing Cross – Gravesend (fast Dartford to London)	2 per hour	Terminates
Luton – Rainham (<i>Thameslink</i>)	2 per hour	Stops
St Pancras International – Faversham (<i>Javelin</i>)	1 per hour	Stops
St Pancras International – Ramsgate (<i>Javelin</i>)	1 per hour	Stops

Additional services operate in the peak.

During the off-peak period four passenger trains per hour pass Hoo Junction in either direction. But in the evening peak this rises to a maximum of six per hour in either direction.

In contrast with freight traffic, there is no reason suspect that is likely to be any great change in the pattern or frequency of passenger services, other than might be introduced by the present proposal: while a significant overhaul of *Thameslink* services is planned on completion of the *Thameslink Programme* (originally called the *Thameslink 2000* programme, it was planned to be in place by the Year 2000, but is still not complete, providing a powerful example of NwR's and the Government's (both major parties) inability to deliver major rail projects), it is still proposed that two off peak services per hour will operate between Luton and Rainham via Gravesend. In the longer term, increasing passenger numbers are likely to lead to an increase, rather than a diminution, in the number of rail services.

Typical current journey times from Gravesend Station to other key destinations (outward direction, off peak) are as follows:

St Pancras International (<i>Javelin</i>)	24 minutes
St Pancras International (<i>Thameslink</i>)	75 minutes
London Victoria	65 minutes
London Charing Cross	55 minutes
London Bridge	45 minutes
Dartford	11 minutes
Rochester	15 minutes
Chatham	18 minutes

Southeastern trains are formed of a variety of classes of electric multiple units (emus) from the Southeastern fleet, and are up to twelve cars long.

Thameslink services are formed of Class 700 emus and normally run as eight car trains.

Operational & Commercial Implications of Proposed New Station

Operational

Any passenger service on the Grain Branch would need to fit the operating practice of regular off-peak services, operating on a clockface pattern. RSC suggests that to be attractive to potential users that a maximum service interval of 30 minutes would need to be provided.

Given the lack of capacity into London, and the inability to terminate Up services at Gravesend Station¹⁶, the obvious way to serve the Hoo Branch, would be to extend services that currently terminate at Gravesend. The only other option would appear to introduce a new service between the Grain Branch and Dartford Station; however, this does not appear to be an attractive option, partly because the feasibility of finding platform capacity at Dartford is questionable, which might well eliminate this option on feasibility grounds, and secondly, on cost/financial feasibility grounds: it would be more expensive to run a new stand-alone service than extend an existing service, which would negatively impact on financial and operational feasibility of the entire scheme.

The obvious candidates for extension are the half-hourly services to London Victoria and London Charing Cross, extension of either would give a 30 minute service frequency, while extension of both would give a 15 minute service frequency. It has been assumed herein than only one of these services would be extended, since not only would a 15 minute service appear excessive for the patronage that is likely to be available, it would cause serious operational difficulties on the single line of the Branch, would require two passenger trains to be held on the Branch while operating freight service and while there are various ways in which this might be managed, all have multi-million pound CAPEX implications, and it would increase the operational difficulties of Hoo Junction.

Either of the two services could be extended, as their timetabled off-peak layovers at Gravesend are fairly similar: 11 minutes for the Victoria service, and 9 minutes for the Charing Cross service. Naturally, the longer the layover the greater the potential to enhance the efficiency of asset and (possibly) staff utilisation through service extension, and reduction in

¹⁶ Even though Platform 1 appears to be reversibly signalled RSC does not consider that it would operationally feasible to do so, on platform occupancy grounds: a half hourly service would prevent us of this platform for at least a quarter of every hour.

the additional rolling stock requirement of the extended service. In this case, as the layovers are close to minimum values, there is no efficiency gain to be had from the proposed re-opening of the Grain Branch to passenger services.

However, any new service is configured platform occupancy at Gravesend Station is an issue that would require careful examination. This issue is most acute in the peak periods, and is one in which a detailed review is outwith the scope of this initial desktop report. Extending services that already terminate at Gravesend does not alleviate the issue, as these would be switched from *Platform 0* to *Platform 2*. RSC has briefly examined the off-peak position, and believes that there is unlikely to be an issue in the off-peak period.

Given the need for freight services to use the Grain Branch throughout the day, how services terminate on the Branch is of crucial importance. The difficulty of the issue is compounded by the fact that, unlike passenger services, freight trains rarely run to a clockface pattern, and certainly do not on the Grain Branch. This is not only because of the demands of freight users and customers, and FOC rostering requirements, but because pathing long distance freight trains is a complex matter, as they can pass through several timetable zones, through several congested nodes, and because of the need in places to flight freight services on some lines; in consequence freight paths tend to be fitted-in, in a manner which can appear random to the outsider. Compounding this is the fact that freight services can often run early or late¹⁷. It might be argued that Hoo Junction yards might be used as a buffer to isolate the Grain Branch from erratic freight train timings elsewhere on the national rail network, but RSC does not accept this: holding freight services would cost the FOCs money, which undoubtedly would have to be found directly or indirectly from the passenger operation; any such proposals would generate strong, and quite possibly fatal, objections from FOCs during the *Network Change* process; and RSC doubts that this would be possible for all freight trains in any event.

If passenger services were to terminate at a single platform station on the main running line at Hoo, RSC projects that this would occupy the single line between Cliffe and Grain for between

¹⁷ In most cases, a freight train is only classed as late if it is more than 15 minutes late, so exact time adherence is less important.

27 to 42 minutes every hour, depending on option¹⁸. It should be clear to all that this would be unacceptable. There are three possible solutions to this problem:

1. to locate the platform at Hoo clear of the running line, this would require a signalised connection to the Branch;
2. to reinstate the station at Grain, which was built in 1951 for twelve coach trains, this would require the boundary between NwR and DBS to be moved further East, the signalled area to be extended accordingly, the extant platform to be refurbished, public access, passenger information systems, lighting, etc. to be installed, and all level crossings on the line brought up to a standard suitable for passenger operation, and relocation of the Marcroft facility; or
3. to reinstate the Allhallows-on-Sea Branch, at least in part (see below).

All of these possible solutions have multi-million pound additional costs. *Option 1* would have the lowest CAPEX, *Option 2* would incur an eight figure additional CAPEX, and increased OPEX, and appears likely to generate little additional revenue, *Option 3* is likely to be little, if any, more expensive than *Option 2* in CAPEX terms and cheaper in OPEX terms, while gaining additional revenue from the proposed new development at Allhallows. Accordingly, RSC suggests that *Option 2* can be dismissed. RSC is sceptical whether the additional revenues that *Option 3* should generate over *Option 1* would be sufficient to justify its higher costs.

A further consequence of the single line occupancy times is that a passing loop would be required on the Branch, with a half-hourly service, as the Up and Down trains would need to cross each other on the single line, even if the line speed were to be improved and speed restrictions eased, as proposed herein. If no such improvements were made, two passing loops would be required. Indeed, without them it appears that even an hourly service would require a passing loop. Naturally, a 15 minute service interval would require even more passing loops, or more probably, at least partial, double tracking.

As noted, above Up services from the Grain Branch would need to cross both the Up and Down tracks of the NKL. Trains coming off the Grain Branch can only cross the Down NKL when the signals have cleared behind the proceeding NKL Down service, with a sufficient clear window

¹⁸ Figures bases on RSC's journey time estimates (qv). Lower figure is that with line speed improvements, etc., higher figure is without these.

to prevent delay to the following NKL Down service, and into a suitable gap between Up NKL trains. When timetabling trains, junction margins need to be added into train timings for moves such as this: an additional two minutes for Up trains would be fairly normal allowance. Detailed examination of the capacity of Hoo Junction is outwith RSC's present brief; RSC's suspects that there should be no great problems in the off-peak period, but that this issue is likely to be more challenging in the peaks, where, at best, Up trains from Hoo might have to wait at the approach signal for a path. Given that NwR has been working with the promoter on the scheme for some years (see below), NwR has no doubt performed *Railsys*, or similar, simulation to establish the feasibility, or otherwise, of the Hoo Junction aspects of the scheme.

Commercial

Given the foregoing, it appears inconceivable that the operator of the proposed new service could be other than *Southeastern*; it is necessary to consider its likely perspective therefore.

There are two elements to the commercial case for the scheme as far as an operator is concerned:

1. Would introducing a passenger service over the Grain Branch enhance profitability for the operator?
2. At the level of individual stations, would a station call enhance profitability? This applies both to any new stations on the Branch, and to any other calls that are introduced at other stations in consequence.

Stopping trains costs train operators money, both directly (e.g. energy, brake wear, number of door operations, traincrew costs from longer end-to-end times, etc.), and indirectly (loss of income from other station pairs due increased journey time, and reduced service reliability and robustness, leading to increased penalty/compensation payments).

There therefore needs to be a business case for the operator to operate the proposed new service, and also to stop a train at any new station, in which it considers that increased revenue from the additional station stop(s) is greater than the costs, and other revenue losses, that it would incur. In some cases, external funding, or other incentives, can be required to tip the balance.

The easiest way to ensure that both a passenger service over the Branch is operated and that all station are used would be to have its use written by the DfT¹⁹ into the service specification for the next South Eastern franchise agreement. Naturally, this would require the DfT to be convinced of the merits of the scheme. RSC's experience The DfT will require the promoter to demonstrate (to *Green Book* standards), that both the direct operating costs of the scheme are less than the extra revenue that would be generated, and that the BCR²⁰ exceeds a threshold that it will set: normally 1.5:1, but the DfT is normally more comfortable with values in excess of 2. Developing a scheme to *Green Book* standards is costly: in the case of this scheme RSC considers that it would be well into six figures.

Schemes of this nature, that depend on future development for viability are difficult to 'stack up', because of the lag between the CAPEX and the timescale required to revenues to exceed OPEX. In RSC's experience, the DfT normally requires a scheme to break even within three years. This appears challenging for the proposed scheme, and it appears to RSC that it is likely to be dependent on the promoter underwriting the operating costs to have any chance of commercial reality.

NwR tend to take an even more jaundiced view of new stations than operators, this is because of the way that the railway industries financial structure operates: essentially, over 90% of NwR's income can be considered to be fixed, for providing the infrastructure on which franchised services can operate, but being subject to penalty payments for failing to provide this. Naturally therefore, although NwR is legally required to facilitate enhancements to the national rail network, it tends to be nervous about anything that uses more network capacity, or reduces network robustness or resilience. For this reason, the delivery process is exhaustive, time consuming, and expensive (see below), and designed to shield NwR from risk. It would be unrealistic to expect that NwR would be genuinely excited by the prospect of reintroducing a passenger service on the Grain Branch, or would welcome it, privately.

¹⁹ Department for Transport.

²⁰ Benefit:Cost Ratio.

The Delivery Process

The scheme development process for works subject to NwR technical approval is a rigidly defined process known as the Governance for Railway Investment Projects process (the GRIP process). There are eight GRIP stages as follows:

1. Output definition
2. Feasibility
3. Option selection
4. Single option development
5. Detailed design
6. Construction test and commission
7. Scheme hand back
8. Project close out

Many participants consider the GRIP process, which was originally imported as a risk-averse process from the nuclear industry, to be somewhat unwieldy, excessively bureaucratic, and unsuited for smaller projects. However, there is no alternative to adhering to this process if works are required to NwR infrastructure, or on its operational lands.

There is a two-stage design process: at *GRIP 3*, and at *Stages 4 and 5*. The relative importance of these two stages varies with the discipline, for example the major design input for permanent way is at *GRIP Stage 3*, whereas that for signalling occurs at *GRIP Stage 4/5*. One of the greatest criticisms that RSC would level against the GRIP process is that NwR makes a change of its project team between *GRIP 3* and *GRIP 4* mandatory. This has three unfortunate impacts:

1. effort expended on a minor scheme in producing and approving an intermediate design output;
2. loss of momentum due to the learning curve of new NwR project management team;
3. unwillingness to allow minor, and inconsequential, unresolved design issues continue through into *GRIP Stage 4*, forcing the entire scheme to pause while these are resolved, this appears to stem from a universal concern of the *GRIP 3* team to avoid explicit or implicit criticism from their *GRIP 4/5* colleagues.

In addition to the above, there are GRIP Stage Gate Reviews. The number of these that are held is at the discretion of NwR, on the largest and most complex schemes they could be held at the end of each GRIP Stage. However, even on the simplest schemes there is mandatory minimum of four, most crucially at the end of *GRIP Stages 3 and 5*. “*Stage Gate Reviews are key checkpoints within a project to establish that a project has delivered products that were specified to be delivered, and if a project can proceed to the next Stage*”.

In theory, it is possible to jump GRIP stages at the start of a project, but much depends on the attitude of the individual NwR staff involved. However, in the case of the proposed Hoo Station, the need to develop a business case, is likely to militate against this.

The process of getting technical sign off at each GRIP stage can be frustrating, and can sometimes be held hostage by intra-disciplinary disagreements within NwR: on occasion RSC has had to support clients in their attempts to broker an agreement between different technical disciplines within NwR. In RSC’s experience it is rare for NwR’s approvals at the design stage to be received by the due date.

A fundamental procurement decision that will need to be made at an early stage would be whether to procure the project from NwR under either:

- a *Development Service Agreement (DSA)*; or
- a *Basic Asset Protection Agreement (BAPA)/Asset Protection Agreement (APA)*.

Under the DSA, the client engages NwR to provide the station, NwR will manage the entire project, who procuring all the services required to deliver the entire project, with the client paying the bills. Whereas under the BAPA/APA²¹ route the client is responsible for procuring the design and construction of the station, with NwR only being responsible for design approvals, and industry processes such as *Network Change*. The conventional wisdom is that the DSA route is more expensive, whereas the BAPA/APA route gives the client more control, and oversight, over the project. RSC’s normal advice is that clients go down the BAPA/APA route, procuring a design & build contract from *GRIP Stage 3* onwards, but the task of concluding an APA cannot be underestimated: in one project that RSC was involved with, the

²¹ A BAPA is used for the early stages, which needs to be converted into a more complex APA for the construction phase.

client's and NwR's legal teams took ten months to finally agree the wording of an APA, despite the existence of a standard template approved by the ORR.

Frequent changes of NwR project manager are also common (six in five years on one project that RSC worked on), which can either arrest or accelerate progress on a project, depending on the relative qualities of the project managers: NwR has some outstanding project managers, but others who are less so.

While the GRIP process is likely to dominate matters, once it has commenced, there are, however, other processes that need to be considered, not the least of which would be to gaining the support from the TOC²² for the new station, and to guarantee that it would stop its trains there; or else to have the project adopted by the DfT. There are other industry approvals, e.g. *Network Change*, but none of these are as problematic as the GRIP process.

Constructing the station would require possessions²³ of the railway to construct. While these can be arranged at short notice, there is a sliding scale of possession charges, which increase heavily as the notice period reduces, meaning that possessions need to be booked more than a year in advance to avoid a booking fee. Nevertheless, possessions are costly, not least due to the compensation costs that have to be paid to train operators; therefore, wherever possible, possessions should be shared with other schemes, and with NwR maintenance activities, to spread the costs. NwR have teams of possession planners, in RSC's experience these are expert in their jobs, and helpful in finding solutions.

Projected Journey Times

In steam days, the timings varied over the years: initially timings of as little as 18 minutes were booked between Sharnal Street and Gravesend, stopping only at Cliffe, with additional halts the best time had increased to 23 minutes by 1924, and remained at a similar level until closure in 1961, when 23 minutes was a typical timing, and it appears that 21 minutes was the fastest

²² *Train Operating Company*, i.e. rail passenger service operator.

²³ Temporary closures of a line, or part of a line, to enable construction activities close to the railway to be undertaken, that are considered to be hazardous while trains are running (e.g. platform construction). These can vary from temporary blocks between trains for minor activities, through *Rules of the Route* possessions at times when no trains are scheduled (often in the early hours of the morning), to weekend possessions (often of 56 hours), through to multi-day closures on the largest projects. Possessions other than *Rules of the Route* possessions involve train diversions and/or bus replacement services, which incur compensation charges.

timing. Timings between Gravesend and Allhallows-on-Sea at closure varied between 33 and 40 minutes in the Up Direction, and between 30 and 35 minutes in the Down Direction.

If the existing line speeds, psrs, approach speed limits, and the token exchange system at Cliffe were to remain unchanged RSC considers that typical journey times from the proposed new Hoo Station are likely to be of the following order (for the purposes of this exercise, travelling times to Hoo Station can be assumed to be 3 minutes less in most cases, direct service to Victoria/Charing Cross assumed):

Gravesend	25 minutes
St Pancras International (<i>Javelin</i>)	56 minutes
St Pancras International (<i>Thameslink</i>)	109 minutes
London Victoria	90 minutes
London Charing Cross	80 minutes
London Bridge	70 minutes
Dartford	36 minutes
Rochester	48 minutes
Chatham	51 minutes

If on the other hand the line speed were to be increased to 60 mph, the approach speed limits to Wyborne LC were to be removed, and the line re-signalled on the track circuit block system throughout, as discussed below, then RSC would anticipate that the journey times from the station would be likely to improved as follows (for the purposes of this exercise, travelling times to Hoo Station can be assumed to be 2 minutes less in most cases):

Gravesend	16 minutes
St Pancras International (<i>Javelin</i>)	47 minutes
St Pancras International (<i>Thameslink</i>)	100 minutes
London Victoria	81 minutes
London Charing Cross	71 minutes
London Bridge	61 minutes

Dartford	27 minutes
Rochester	39 minutes
Chatham	42 minutes

It should be noted that none of the above times assume that any delays would occur at any of the passing loops, through which trains would pass at full line speed. This is a somewhat heroic assumption, which would only be achievable with both a higher degree on operational discipline than is achievable on the, complex and difficult to operate, South Eastern network, and if extended passing loops were provided. Even then, 60 mph turnouts would be required, which are large and costly items that would be unlikely to be provided: in reality 40 mph turnouts are likely to be best that would be provided. The above times should therefore be seen as somewhat optimistic.

Subject to suitable signalling and level crossing protection arrangements, there appears no technical reason why the line speed could not be increased to the same 70 mph speed limit as the NKL, but only around 30 seconds in journey time would be gained, although the increase in CAPEX is also likely to be minimal.

Rolling Stock Implications

Either scenario would require the TOC²⁴ to have more units in service to cover the increased cycle time of the extended service, but the answer is different in each case. If the existing line speed, etc. were not to be increased then an additional two trains, equivalent to six four car emus would be required for a half-hourly service. Whereas, if the speeds were to be improved as described above a single additional train (three emus) would suffice.

While it might be possible that *Southeastern* might be able to find some of the additional rolling stock from within its existing fleet, by improved utilisation, this should not be assumed, as TOCs devote considerable effort to utilising their, expensive, rolling stock efficiently, and have optimised fleet utilisation over many years. It should therefore be assumed that this number of additional sets will need to be leased.

²⁴ Train Operating Company: an operator of franchised rail passenger services.

It is an unfortunate fact that, as it only appears possible to serve the Grain Branch by extending a terminating service from Gravesend, that it will be necessary to procure more additional emus than the likely patronage on the Hoo Branch would justify, as the train length is driven by capacity requirements closer to London. Given the very high costs of leasing rolling stock, this cannot but have a severe negative impact on the commercial viability of attempts to re-introduce a passenger service on the Grain Branch.

Engineering Aspects

Overview

As discussed above, implementing this scheme would involve more than simply constructing a station: it would be necessary to bring the parts of the line used for passenger services up to suitable standard for regular passenger operation. Some of the works would be mandatory safety requirements, or works that NwR would require in discharging its role as a *Duty Holder* under ROGS²⁵, while others would be required to make rail competitive with other modes. Essentially, the following minimum works would be required:

- construction of new station;
- complete re-signalling of line;
- bringing permanent way up to passenger standards;
- electrification of parts of the Branch used by passenger services;
- replacement of level crossings on passenger route;
- line speed enhancement.

In addition, there are other option-dependent works that would be required were these to be exercised, these include:

- any further stations from extension beyond Hoo;
- any further intermediate stations, e.g. Cliffe;
- reinstatement of branch to Allhallows-on-Sea;

²⁵ *The Railways and Other Guided Transport Systems (Safety) Regulations 2006.*

- train berthing facilities.

It is understood that NwR have been considering the infrastructure enhancements that would be required to re-introduce a passenger service on the branch for some time: *“Network Rail’s System Operator team are working with Medway Council to identify the challenges of reintroducing passenger services to the Grain Branch”*²⁶. RSC therefore considers that it would be reasonable to expect that promoter should have a good grasp of the works that are required, and the main technical challenges that would need to be faced. It should therefore already have answers to these questions.

Station Facilities

As noted above, Hoo Station would need to have a platform long enough to be able to accommodate twelve car trains: an absolute minimum length of 245.2 metres. If the platform is constructed as a terminal platform, clear of the running line additional overrun will be required beyond the platform to the stops, as dictated by a risk analysis undertaken to RSSB²⁷ standards.

The form of the station will be determined by the decision on where trains terminate on the Grain Branch. If trains were to continue beyond Hoo Station to Allhallows-on-Sea or Grain, then only a single platform on the running line would be required. This would not even require specific signalling. But if, on the other hand, trains were to terminate at Hoo then the platform track would be a spur off the main running line (possibly on the same formation and parallel to it). This would require a power worked turnout to be provided, and for this connection to be protected by signals in either direction, most likely with a junction indicator on the approach. In effect, this would then split the Grain Branch into three single line sections: Hoo Jcn-Cliffe, Cliffe-Hoo Station, Hoo Station-Grain. Naturally, this second option would increase the cost of the station considerably, probably by around £7M plus contingencies.

Platform canopies will need to be provided over at least part of the length of the platform. Ticket machines, seating, CCTV, panic alarms, and passenger information systems would also be required.

²⁶ *South East Route: Kent Area Route*, NwR, May 2018.

²⁷ Rail Standards and Safety Board.

Naturally, effective integration with other transport modes would be key to the success of the new railway station. As such interchange with bus, 'kiss and ride', taxi bays, short term 'station business' parking, and disabled parking should be provided as close to the platform, as is possible. Behind this a dedicated station car park will be required, of more than adequate size for the maximum anticipated use, so that users can always be sure of finding a parking space (otherwise many potential users would avoid the station), electric vehicle charging points should be provided, with passive provision to increase the number of these easily, as electric vehicle use increases. The cost of car parking is likely to be key determinant of the ability of the station to attract users from elsewhere on the Hoo Peninsular, this could be a problem, as successful station car parks can be seen as unregulated 'cash cows' by TOCs.

The size of the car park would be heavily determined by whether the catchment area of the station is to be the entire Hoo Peninsular, or whether other stations are provided on the peninsular.

Signalling & Level Crossings

Insofar as signalling is concerned, the *de minimis* works to permit regular passenger services onto the Grain Branch would be to provide TPWS on all the signals protecting passenger train movements, convert the Hoo Junction to Cliffe portion of the line to a track circuit block system, installation of at least one signalled passing loop, and a facing point lock on the turnout to the Cliffe private siding, which given that it was installed after passenger services ceased, might well not be so fitted. The turnout into Hoo Junction Down Sidings might also require facing point lock protection. However, not only would even this limited work exceed the available capacity within NG SSI in RSC's opinion²⁸, but it would not provide a working solution, in view of the inability to terminate trains on the running line at the proposed Hoo Station without disrupting freight operations.

Thus, the minimum signalling works would consist of TPWS, one/two signalled passing loops (number dependent on option), plus (probably) facing point protection where required, at least five signals, and a power worked turnout at and protecting the new Hoo Station, relocation of the token machine from Cliffe to Hoo, and enhancement of the capacity of NG SSI.

²⁸ RSC believes that the works described below would require 15 to 20 modules in the SSI, way beyond the available module slots.

The enhanced SSI capacity could be delivered either by splitting the existing *NG* interlocking into two geographic areas, or by replacing the SSI by a more modern interlocking with several times the capacity of the existing SSI. Either approach should give more than sufficient capacity for any works envisaged on the Grain Branch. But both approaches would require a new digital interlocking to be provided.

However the adjustments to the local interlocking capacity are made, any interventions with the functions of an SSI are phenomenally expensive, given the design, checking, installation, and testing requirements. Once this expenditure is invoked it would then become a nonsense not to re-signal the Grain Branch to modern standards, as, provided that everything is designed in from the outset, the incremental additional cost that would be incurred would be a small fraction of the total cost.

Thus, RSC considers that the only sensible solution is to re-signal the entire line on the track circuit block principle to passenger train standards as far as Grain LC/Stoke Junction. The connection to the Brett Marine private siding at Cliffe would become a signalised and power worked connection, with private siding working commencing beyond the signal protecting the Grain Branch on the private siding leg. Token exchange, and the need for trains to stop, at Cliffe would be abolished. The signalling would be designed for the maximum line speed envisaged.

Additional telecoms equipment would be required (e.g. signal post telephones), this might require an upgrade and/or extension of the local railway telecoms network.

RSC considers that retention of Wybourne LC as an AOCL is unlikely to be acceptable to either the *Duty Holder* or the ORR if a half-hourly passenger service were to be introduced on the line. Accordingly, a full barrier crossing would be *de rigueur*, most likely with CCTV surveillance and obstacle detection. This would have the advantage that it would eliminate the 15 mph approach speed limits on this crossing. CCTV coverage would be monitored from Ashford ASC

In the event that the service were to continue to the East of the proposed Hoo Station all of the crossings, other than Grain LC, would require similar replacement. But if a service were to be provided to Grain Station, RSC suspects that NwR would insist on the replacement of Grain Crossing Signal Box in any event, and thus Grain LC would be replaced in modern form as well.

An ergonomic study would be required at Ashford ASC to verify that train control on the Grain Branch, and monitoring CCTV coverage from level crossings is within a signaller's capacity. Given, that the standard is that a single signaller is only permitted to monitor CCTV coverage from four level crossings, it may very well be that an additional signalling desk would be required within Ashford ASC, with significant CAPEX and OPEX implications.

Permanent Way

A permanent way condition survey would be required before RSC could comment meaningfully on the works that would be required to bring it up the standards required for passenger operation, and for higher speed running. However, while RSC is sure that NwR maintains the track competently to a standard suitable for freight-only use, this is not the same standard as would be required for the proposed scheme. Projects that convert British freight-only lines into passenger lines, or which seek to increase line speeds always require extensive quantities of track renewals, and the remainder of the track to be re-fettled.

The condition of the formation is likely to be more of a concern than is normally the case, given that parts of the formation run across marshland. Although, passenger trains impose much lower axle loads than loaded bulk freight trains, the geometric and stability standards that the formation must meet are higher. In consequence, it is possible that expensive and disruptive remedial works to the formation might be required, although RSC believes that this should be seen more as a risk factor, than as a cost item that should be included in cost estimates, at present.

Electrification

All of the possible service options would entail the operation of electric multiple unit (emu) rolling stock, and any parts of the Branch over which passenger services operate would therefore need to be electrified on the 750V dc third rail system that is standard on this part of the national rail network. The promotor might attempt to claim that hybrid or battery technologies, that are now starting to appear in the rail industry might be used; however, RSC does not consider this a credible argument in the present case, given that viability appears to depend on extending an existing service over the Branch, and thus all trains in the existing service group would need to be replaced by hybrid units, at a cost of many tens of millions of pounds.

Given that the Office of Road and Rail Regulation (ORR), the statutory safety body from whom the *Duty Holder* (NwR) would need to obtain approval, is opposed to further extension of the third rail network, it is by no means certain that the ORR would grant approval to electrify the Branch. However, RSC believes that it is more probable than not, that approval would be granted as a “*small infill electrification*” scheme. Nevertheless, enhanced safety features, beyond those encountered on the heritage third rail network are likely to be required, including clip-on insulating plastic shrouds around the sides and underside of the third rail throughout, and enhanced grids at crossings.

Given, that it would be necessary to cater for twelve car trains, RSC believes that although it should be possible to electrify to Hoo with single additional substation this is likely to need to be rated at around 6-7 MW. Were the passenger operation to be extended further to either Allhallows-on-Sea or Grain, either one or two more substations would be required. Power supplies to the substation(s) and feeders would also need to be provided, although RSC suggests that, given the legacy of power generation on the Hoo peninsular that a suitable power supply runs to substations should not be difficult to arrange, or be exceptionally costly.

Third rail requires special sleepers and bearers to support the insulators holding the third rail, shown in the photograph below, at least every fourth sleeper or bearer needs to be thus. As a non-electrified line, it is unlikely that there are any of these special sleepers on the Branch. Where the permanent way will require complete renewal to make the line suitable for regular passenger use and/or higher speeds, fitting suitable sleepers and bearers at renewal should present no problem, but where the existing track can be retained, every fourth sleeper would need to be replaced with one able to mount an insulator.



A modern aluminium conductor rail with a stainless steel rubbing face would be provided.

Reinstatement of Allhallows-on-Sea Branch

As noted above, one option for resolving the inability to terminate trains at Hoo on a platform on the running line is to reinstate the former Allhallows Branch, to exploit the planned development in this vicinity. Satellite imagery indicates that the formation of this Branch is still intact. The principal issue is that the former station site at Allhallows-on-Sea has now become a mobile home park. While, in theory, this could be cleared, there appears to be no reason why the station needs to be located on its former site, indeed a location further South on the old formation would appear to serve the centre of the proposed new development better, and would be cheaper to construct: the further South on the old formation that the station is constructed, the lower that the CAPEX and OPEX would be. In railway operational terms, the station would fulfil its role if it were located at Stoke Junction, but not perhaps in transport terms: RSC assumes that were the Allhallows option to be implemented, the first 2.0 km of the Branch would be reinstated, terminating on the South side of Binney Road, to avoid a road crossing, whether at grade, or grade separated.

This extension of the passenger service would require at least one additional passing loop, even with a 60 mph line speed and abolition of all level crossing approach speed restrictions. Otherwise the signalling should be much the same as the option of terminating at the proposed Hoo Station: effectively the connection and signalling that would have been provided at Hoo would be relocated to Stoke Junction²⁹. RSC assumes that one train working by means of track circuit block, would be provided North of Stoke Junction³⁰, and that Allhallows would be a single platform station, twelve cars long, with the same facilities as previously described for Hoo.

Given that the trackbed appears to be *in situ*, restoration of the permanent way should be fairly straightforward. Since this section of alignment runs across one of the more marshy parts of the Hoo Peninsular (largely) on a low embankment, the first task would be to test the bearing strength of the formation, and it is not inconceivable that expensive formation treatment works could be required, although this is not a foregone conclusion. In any event it would be necessary to install a new track drainage system, including a drainage membrane and a blinding layer across the entire width of the formation, as well as French drains, probably to

²⁹ Just one extra distant signal is likely to be required.

³⁰ In all, RSC estimates that up to the equivalent of forty SSI modules might be required for the total signalling works, in the event that the option of extending to Allhallows-on-Sea were to be exercised.

both sides of the embankment, given the ground conditions. Fresh, new, bottom ballast would be laid over this, on which concrete sleepers would be laid (NwR's current standard is to use the stronger and more expensive *G Series* sleepers, in lieu of *F Series* sleepers, which RSC suggests would be more appropriate of this section on line³¹), and top ballast spread. RSC envisages that continuously welded rail (cwr) would be laid, although the curve onto the Allhallows spur at Stoke Junction appears to be right on the 400 metre horizontal curve radius limit for cwr, and long-welded rail might be required on this curve instead.

The reinstated alignment would require a secure sheep-proof fence to be installed to either side for its entire length.

It is apparent the former trackbed has become farm internal roadway for almost its entire length. Thus, reclaiming it would require sensitive negotiation with the landowner, and it is likely, that as part of the compensation package for the land purchase, that an alternative all-weather roadway would need to be constructed for the entire length of the line. Severance of farmland is likely to be an issue, which would require at least one accommodation bridge to be provided; although it is likely to be cheaper to simply purchase, and re-sell, all of the land on one side of the alignment.

Likely Costs & Timescales

Estimated station CAPEX has a broad spectrum at the present level of detail: the size of the station, and the level of architectural ambition employed would be a key a determinant, as would the extent of the signalling modifications that would be required. It has been assumed herein that a modest stations would be provided.

The railway would have to remain 'live' throughout the construction process, with works close to the track being undertaken under possessions, and the station (and all other works in vicinity of the railway) would be need to be built by contractors accredited under RISQS³².

No stations other than at Hoo and Allhallows (Allhallows option only) have been assumed.

³¹ This is likely to be enforced for any track renewals that are required on the Grain Branch. Although this would be more appropriate where 25.4 tonne axleload freight traffic is operating.

³² The *Railway Industry Supplier Qualification Scheme*, administered by the RSSB (Rail Standards and Safety Board), this has replaced NwR's earlier *Link-Up* scheme.

Exclusive of the costs of land purchase, planning approvals, and rolling stock, RSC initial estimate is that the indicative CAPEX range would be between £55M and £85M for the option of running to Hoo, and between £105M and £150M for the option of running to Allhallows-on-Sea. These figures assume that the project would be tightly managed, to a standard somewhat better than is the norm on Britain's national railway network, functional stations are provided, with the minimum facilities described herein provided, and that the stations are devoid of architectural pretention. They also assume that the APA/BAPA procurement route is selected; RSC's estimates would have been higher were the DSA route to be used. It can be seen, therefore, that there is considerable potential for costs to escalate well above those quoted herein, which should be considered the minimum achievable costs.

Given the processes outlined above, if one assumes that once the client 'presses the go button', the project is pursued without hesitation, so that each activity proceeds immediately from the next, the fastest possible implementation time for the project would be around 3½ years, while a timescale of 4½ to 7 years is more realistic. In reality, few projects are pursued with such unrelenting zeal by clients, resulting in a 'stop-go approach' which can add several years to timescales.

Conclusions

It is considered that the proposal is technically and operationally feasible but, there are a number of challenges, which include:

- Grain Branch is not signalled to passenger standards;
- there is insufficient capacity in NG SSI at Hoo Junction to signal the line to passenger services;
- permanent way has only been maintained to standards appropriate for a 20 mph freight only line;
- level of freight use of the Grain Branch, which RSC considers is more likely to increase than decrease, overall;
- consequent inability to terminate passenger services on the running line at Hoo;
- current speed restrictions and token exchange arrangements on the Grain Branch would prevent journey times that are competitive with other modes;

- need for passenger trains to cross each other on the Grain Branch under most service scenarios;
- inability to terminate proposed Branch services at Gravesend Station;
- length of trains that could be extended to form Grain Branch service;
- existing level crossings on Branch are not suitable for a passenger service to be introduced in their current form;
- operation of Hoo Junction.

RSC considers that all of the above issues could either be rectified, or worked around, albeit at considerable cost.

The most sensible service option appears to be to extend the half hourly service from either London Victoria, or London Charing Cross that terminate at Gravesend, currently. This should be accompanied by an increase to the line speed on the Grain Branch to at least 60 mph, in conjunction with elimination of the current approach speed limits, and token exchange at Cliffe.

Even with these improvements RSC anticipates that journey times from the station would only appear attractive for potential users to Gravesend, Dartford, and the stations that adjoin these: even under the most optimistic assumptions it would take over an hour to reach London Bridge Station on a direct service, and 39 minutes to reach Rochester Station.

RSC's initial view is that the minimum CAPEX of the proposal is likely to lie in the range between £55M and £150M, dependant on option, but there appears to be considerable potential for costs to escalate well beyond this level.

There appear to be three possible ways in which the service might terminate, without causing unacceptable disruption to freight services:

- in a bay platform, clear of the running line, at the proposed Hoo Station;
- by bringing the former Grain Station back into use, and restoring the loops at Grain to a signalised area;
- reinstating part of the former Allhallows Branch and providing a new station at Allhallows-on-Sea;

The fastest possible implementation time for the project is considered to be 3½ years, from the time that a firm commitment is made to proceed through the *GRIP* system, but an implementation time in excess of five years is more likely.

Evaluation of the likely patronage and the likely CBR of the scheme will be a matter for others, qualified in the field, which RSC is not, to consider; but, based on decades of previous experience, RSC would be pleasantly surprised if the proposed scheme were to be anywhere remotely close to either financial or economic viability.

Questions that Need to be Answered

RSC suggests that the following questions might be included amongst those that the promoter should be required to answer:

1. Between which stations is it proposed that the service would run, given that Platform 2 at Gravesend Station can no longer terminate trains arriving in the Up Direction, and the former through lines have been abolished, which could have been used to bypass terminating trains?
2. Would it be feasible to terminate trains on the running line at the proposed Hoo Station, given the freight services that use the line, and the pathing requirements for the passenger service in either direction? If not, what other terminal arrangements are proposed, and what would be the likely cost implications of these?
3. Does the promoter consider that current maximum permissible line speed on the Grain Branch, coupled to the various permanent speed restrictions (psrs), approach speed restrictions, and token exchange at Cliffe GF/signal *NK509* would permit:
 - a. a service that offers journey times that are compatible with those offered by other modes; and
 - b. would enable any services that are extended to turn round at either the proposed Hoo Station, or some other point on the Hoo Branch, to be turned round within the available window to meet their Up path timetable slot? (Please demonstrate this).

If not, what increases to line speed and psrs are proposed?

4. What journey times are anticipated between the proposed Hoo Station, and other key destinations? In deriving this, what pathing and junction margins have been included, and what upgrade works have been assumed?
5. Is it proposed to provide any other new stations, other than Hoo, as a part of the scheme, or upgrade any existing station.
6. Please could the promoter demonstrate that the proposal would be feasible in junction capacity terms at Hoo Junction, particularly in respect of the impact of Up trains from Hoo on North Kent Line services, given the need for a crossing movement.
7. Please could the promoter demonstrate that the proposals are feasible in platform capacity terms at Gravesend Station.
8. Would any modifications to existing train paths, or additional train services be required to the West of either Gravesend Station, or Ebbsfleet Station?
9. The Grain Branch is not signalled to passenger train standards. What works are proposed to bring the signalling system on the Grain Branch up to the standards required for passenger services, and what would the likely cost be?
10. Given that it appears that there appear to be insufficient spare modules within the *NG* SSI at Hoo Junction to enable the Grain Branch to be signalled to passenger standards from it in its present form, what strategy is proposed to deliver the resignalling, and what would be the likely capital cost and timescale?
11. Wyborne Level Crossing is of the AOCL form, does the promoter accept that the *Duty Holder*, and regulatory authorities would be unlikely to accept its retention in this form if a regular passenger service were to be introduced? What working assumptions and CAPEX allowance have been made for its renewal in the promoter's proposals?
12. If it is envisaged that the passenger service is extended beyond the proposed Hoo station in the Down Direction, what are the promoter's proposals in respect

of Stoke Creek LC, Recreation LC, Middle Stoke LC, and Grain LC? Or whichever of these are appropriate to the service extension proposed?

13. Would the proposals have any impact on current or future freight services on the Grain Branch? If so what would they be, and have these been discussed with the FOCs and customers concerned? Have any indications been given by the FOCs that they would support a *Network Change* application for the proposed scheme?
14. Does the promoter accept that the line would require electrification to operate passenger services? If not why not, and what alternative would be adopted? Which electrification system would be adopted? What is the estimated CAPEX of the solution proposed by the promoter?
15. What upgrades to the permanent way does the promoter believe will be necessary to bring the Grain Branch up to passenger standards, and how much money has the promoter allowed for this?
16. Does the promoter accept that it would be necessary to design any new station on the branch to accept twelve car trains? If not, why not?
17. How would the new station be procured? (i.e. would the DSA or APA process be used, and what would be the development, design and construction strategy?)
18. What would be the implications on freight services of the possessions required to construct the station, and the resultant costs incurred.
19. What is the estimated total capital cost and timescale to provide the proposed station, and all associated works required to provide a passenger train service (including the sums identified above)?
20. What discussions have been held with Network Rail (NwR), Southeastern, and the DfT? What support has been forthcoming? What has the promoter been instructed/requested to demonstrate before the scheme could be implemented?

21. Has Southeastern given any commitment that it would use the new station, were it to be constructed, or has the DfT given any commitment that its use would be written into the next franchise specification?
22. The DfT only supports schemes where the revenue generated exceeds any increased costs. What are the estimated costs and revenues of the proposal? Please indicate the fare and trip number assumptions made in the current revenue estimate, and disaggregate the costs into at least the assumed infrastructure (e.g. NWR charges), and train operating costs.
23. After how many years is it anticipated that the project would break even in OPEX terms?
24. What is the BCR (Benefit:Cost Ratio) currently projected?
25. Is any third party given a firm and binding commitment to support CAPEX, and/or OPEX? If so by how much?

In addition, it will be necessary to ask some detailed questions in respect of the anticipated demand, and the financial and economic viability. It is assumed that these questions will be framed by others.

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

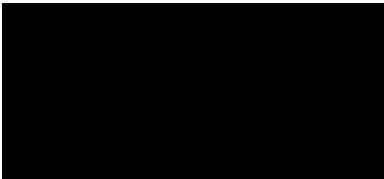
Name:

Andrew Wilford

Name of organisation (if applicable):

Esquire Developments Ltd

Address:

A large black rectangular box redacting the address information.

Email:

A black rectangular box redacting the email address.

Phone:

A black rectangular box redacting the phone number.

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: **See attached report**

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

Yes ☒

No ☐

Comments: **See attached report**

3. Does the vision reflect your priorities?

Yes ☒

No ☐

Comments: **See attached report**

4. Is it concise and easy to understand?

Yes ☒

No ☐

Comments: **See attached report**

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

Comments: **See attached report**

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

See attached report

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

See attached report

PLANNING FOR GROWTH ON THE HOO PENINSULA CONSULTATION

**REPRESENTATIONS SUBMITTED
BY ESQUIRE DEVELOPMENTS**

MAY 2020



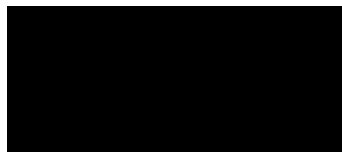
ESQUIRE

DEVELOPMENTS

MEDWAY COUNCIL HOO PENINSULA CONSULTATION

**REPRESENTATIONS SUBMITTED BY
ESQUIRE DEVELOPMENTS LIMITED**

May 2020



Tel: [REDACTED]
e-mail: [REDACTED]

COPYRIGHT

The contents of this document must not be copied or reproduced in whole or in part without the written consent of Esquire Developments Ltd.

CONTENTS

Page No.

1.0	INTRODUCTION	01
	i) About Esquire Developments	01
	ii) Content of Representations	02
2.0	THE ROLE OF SMEs	04
	A. The Governments Position on SMEs	04
	B. Pace of Delivery of an SME	10
	C Conclusion	13
3.0	RESPONSE TO CONSULTATION QUESTIONS	14
4.0	SUMMARY	21

APPENDICES

APPENDIX A – Lodge Hill, Chattenden - Emerging Development Proposals

APPENDIX B – Sturdee Sports Club, Stoke Road – Emerging Development Proposals

APPENDIX C – The Hollies, Sharnal Street, High Halstow – Emerging Development Proposals

APPENDIX D – Extract of Character Area – Chattenden/Deangate

APPENDIX E – Extract of Character Area – Contemporary Living at Railway Station

APPENDIX F – Extract of Character Area – High Halstow

1.0 INTRODUCTION

- 1.1 These representations are submitted by Esquire Developments Ltd in response to Medway Council's (MC) Hoo Peninsular Consultation. Representatives of Esquire Developments attended and participated in the Hoo Peninsular Workshop held by MC on 24 February 2020.
- 1.2 Esquire Developments has a number of land interests across the Peninsula, namely:
- Land at Lodge Hill, Chattenden : Circa 20 dwellings inc, Self Build, **(Appendix A)**
 - Former Sturdee Sports Club, Hoo : Circa 100 dwellings commercial and nursery provision **(Appendix B)**
 - Land at Sharnal Street, High Halstow : Circa 30 dwellings **(Appendix C)**
- 1.3 The sites are located either immediately adjoining or in close proximity to the identified growth areas around Hoo and High Halstow and are considered logical sites for inclusion as part of the wider growth of the Peninsular.
- 1.4 All the above sites are considered suitable, available and deliverable and therefore appropriate for inclusion in the emerging growth proposals, which we support.
- 1.5 We support the general visions and aspirations of the document and also Medway's desire to deliver high quality development whilst seeking to meet its housing requirement. Due to the need to deliver at pace, but also in a planned manner, there will need to be a balance struck between the early delivery of sites whilst ensuring community and public infrastructure is delivered.
- 1.6 In addition, it will be important to ensure that both a mix of site size and mix of developers are identified and encouraged to come forward i.e. do not rely on a few number of housebuilders on a few number of large sites. Whilst these sites are important to deliver 'numbers', each site will inevitably have its own delivery rate and therefore the best way to achieve delivery is by also identifying small to medium size sites that can deliver alongside the larger sites, but do not have has significant lead in times . This factor should be seriously considered when assessing the suitability of sites in the wider growth opportunities and sites being put forward.

i) About Esquire Developments

- 1.7 Esquire Developments is an award winning SME Housebuilder based in Longfield, Kent. Founded in 2011, it has quickly established itself through the delivery of high quality bespoke residential developments in Kent.

- 1.8 Esquire Developments has adopted a tailored approach to its developments adapting designs and layouts to reflect local characteristics and respect local communities needs. This is through expert local knowledge and understanding of a place, but also positively engaging with the local community allowing for a focussed approach to planning, design and greater understanding of the needs of the local community.
- 1.9 Each development is bespoke and we do not have fixed house types. This allows us to be totally flexible when it comes to the choosing the right mix and design of each home. This is reflected in the high-quality architecture and use of materials, but also quality of open spaces and the environment in which each development sits within.
- 1.10 Esquire Developments also delivers commercial buildings such as office space and children's nurseries to complement developments where local demand identifies such a need. This means our developments can meet a local community's needs in a number of ways, whether that is for people to live, work and play.
- 1.11 Esquire Developments has delivered a number of sites in Medway and is presently building sites on the Peninsula at Chattenden (Riverbourne), Cliffe Woods (Woodlands) and Cliffe (Manor Farm). As an SME Housebuilder, Esquire Developments can expediently deliver a high quality product that brings variation and choice to the market and complement volume housebuilders.
- 1.12 Esquire Developments Managing Director presently chairs the local Kent SME Developer Network. The SME Network is a collection of active SMEs in Kent with a focus on Medway, Swale and Maidstone (at present) to bring together collective thought and best practice as well as sharing knowledge to increase and improve the delivery of development in the local area by SME Developers.

ii) Content of Representations

- 1.13 These representations are structured as follows:

Section 2.0: The Role of SMEs;

Section 3.0: Response to Consultation Questions

Section 4.0 : Summary

- 1.14 Notwithstanding specific land interests, these representations have been prepared in objective terms and assessed against the prevailing planning policy and guidance framework set out within

the National Planning Policy Framework (NPPF) (February 2019) and National Planning Policy Guidance (PPG) (March 2014 as amended).

1.15 In summary the headline points are as follows:

- We support the Councils desire to deliver the Growth envisaged on the Hoo Peninsula.
- We support the identified infrastructure upgrades identified as being required and particularly the delivery of the new Railway Station, which will result in a significant modal shift pattern for the Peninsula;
- We are disappointed that there is no reference to SME Developers in the document or what role they could play in the delivery of the growth on the Peninsula.
- We consider improvements could be made to the vision as a whole by consideration of additional sites/areas, including those put forward by Esquire Developments to help deliver sites at pace and with a mix and choice of products to the market.
- We consider that for the vision to effective, further detail will be necessary that sets out the specific sites, phases and uses.
- The Sites promoted by Esquire Developments, are “suitable”, “available”, “achievable” and therefore “deliverable”. They are each suitable for allocation in their own right.

2.0 THE ROLE OF SMEs

- 2.1 This section of the representations set out the importance currently being placed by Central Government on the role of Small to Medium Enterprises (SMEs) in the housebuilding Industry and demonstrates the vital role SME Housebuilders will play in complementing volume housebuilders to deliver the Council's housing requirements and in turn the national housing target.

A. *The Government's Position on SME'S*

i) **Building More Homes – July 2016**

- 2.2 The Government has made it clear that it is committed to increase housebuilding to deliver 300,000 homes per year by the mid 2020's. The target figure of 300,000 homes per year comes from a recommendation in the House of Lords Economic Affairs Committee report, 'Building More Homes', published in July 2016¹. The figure takes into account estimated population change but also to address the backlog created by the failure to build enough homes over many years. All the main political parties have accepted the 300,000 dwelling per annum figure.
- 2.3 Statistics monitoring completions across the UK (gov.uk) confirm Housebuilding has not achieved this level of growth since 1977-78 (314,090 dwellings – Live_Table 109) and in 2017-18² only 222,194 dwellings (Live_Table 122) were completed. Whilst this is an increase since 2012-13 (124,722 completed dwellings), this is still well short of the 300,000 dwelling target.

ii) **Home Builders Federation – January 2017**

- 2.4 In January 2017, the Home Builders Federation prepared a research paper titled 'Reversing the decline of small housebuilders: Reinvigorating entrepreneurialism and building more homes'³. This document highlighted a number of facts, inter alia:

- In 1988, small builders were responsible for 4 in 10 new build homes (40%). Today it is just 12%.
- In 1988, 12,000 SMEs were building houses. In 2017, this figure was only 2,500 SMEs.
- The average permissioned housing scheme has increase in size by 17% since 2007, suggesting many allocated sites are out of reach for smaller companies.
- Small sites are consistently efficient in their delivery.

¹ <https://publications.parliament.uk/pa/ld201617/ldselect/ldeconaf/20/20.pdf>

² 2018-19 data is not yet complete.

³ https://www.hbf.co.uk/documents/6879/HBF_SME_Report_2017_Web.pdf

- Delay and risk during the planning stage has influenced lender attitudes to housebuilding meaning terms SMEs borrow on are restricting growth opportunities.
- In 2007-2009, 33% of small companies ceased building homes.
- Returning to 2007 home builder levels could see housing supply boosted by 25,000 dwellings per year.

- 2.5 The HBF report attributes the reasons for the decline in SMEs has been for two principal reasons:
1. A long-term trend following landmark planning legislation in 1990 which tipped the balance of control significantly further away from entrepreneurial home builders to LPAs; and,
 2. The above long-term trend compounded by the Global Financial crisis in the late 2000s when the availability of development finance became a concern.

- 2.6 The report continues that *'the above effects are further compounded by the availability of suitable housing sites and the constant struggle of securing an implementable planning consent through the planning process beset by delays and bureaucracy. These delays and associated costs have tangible impacts on SMEs and their ability to grow. Whilst larger companies can mitigate risk across a number of sites, small firms encountering delays on one or two sites will be the difference between a year of growth and a year of contraction'*.

iii) White Paper – February 2017

- 2.7 The release of the Government's White Paper in February 2017 titled 'Fixing our Broken Housing Market'⁴ only reinforced the concerns about the lack of SMEs building Houses. The Report identified 3 main problems and described the housing market as 'broken', blaming the supply shortage, *"for too long, we haven't built enough homes"*. The three problems were identified as:

1. Not enough local authorities planning for the homes they need;
2. House building is simply too slow; and,
3. The construction industry is too reliant on a small number of big players. (our emphasis)

- 2.8 The white paper outlined the Government's plans to change ('fix') the market. It called for *'a new approach to house building that included: building homes based on need; building homes faster; diversifying the house building market; and by making it more affordable for people to buy homes.' (our emphasis)*

4

https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/590464/Fixing_our_broken_housing_market_-_print_ready_version.pdf

- 2.9 The White Paper was clear that the Government intends to open the housing market to smaller builders and those who embrace innovative and efficient methods.

iv) House of Lords Debate – January 2018

- 2.10 On 11 January 2018, the House of Lords debated ‘Housebuilding in the UK’⁵ and noted the performance of the UK’s major house builders. The debate acknowledged the 2017 HBF report and focussed on the HBF suggestion that part of the practice of local authorities focusing on larger sites with a very high number of units may be counterproductive. The debate acknowledged *‘that while it may be efficient in strong market areas, it is inefficient in weaker market areas. While the NPPF has been lauded for increasing the number of planning consents, it is argued that the number of sites permissioned, in areas of need, remains short of where it needs to be.’*

v) Revised NPPF – July 2018

- 2.11 The manifestation of the above discussions set about the introduction of a new approach within the revised NPPF 2018⁶, which sought to encourage the use of smaller sites and the requirement that 10% of the housing requirement on sites no larger than 1ha should be identified. The 10% target and 1ha was amended from the consultation version suggestion 10% of ‘allocations’ and only 0.5ha sites. The increase acknowledged the greater variety of sites SMEs are attracted to.

vi) Letwin Independent Review of Housing Build Out Rates – October 2018

- 2.12 In October 2018, Sir Oliver Letwin issued his final ‘Independent Review of Build Out’⁷ report and recommendations on how to close the significant gap between the number of housing completions and the amount of land allocated or permissioned on large sites in areas of high housing demand.
- 2.13 Whilst the main body of the report focussed on the perceived issue of land banking, Sir Oliver Letwin identified that the *‘build out rate’ on small sites is intrinsically likely to be quicker than on large sites; (to take the limiting case, a site with just one house will take only as long as required to build one unit).’*

⁵ <https://researchbriefings.parliament.uk/ResearchBriefing/Summary/LLN-2018-0001#fullreport>

⁶ <https://webarchive.nationalarchives.gov.uk/20181206183454/https://www.gov.uk/government/publications/national-planning-policy-framework--2>

⁷ https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/752124/Letwin_review_web_version.pdf

vii) **Homes England Strategic Plan 2018-2023 – October 2018**

2.14 In October 2018, Homes England released its 5-yr '*Strategic Plan 2018-2023*'⁸ plan to detail how it will improve housing affordability, helping more people access better homes in areas where they are needed most. The plan outlines their ambitious new mission and the steps that they will take, in partnership with all parts of the housing industry sector, to respond to the long-term housing challenges facing the country.

2.15 The Strategic Plan goes to some lengths identifying the decline in SME housebuilders and the result being the house building market is increasingly made up of a small number of house builders, meaning there is insufficient diversity, competition and capacity. The report continues:

There are a number of barriers preventing smaller builders from delivering a greater number of homes including: a lack of development finance; a land market weighted in favour of larger builders; and a complex planning system.

This is why we'll create a more resilient and competitive market by supporting smaller builders and new entrants. In addition, Homes England will work with house builders to promote better design and higher quality homes.

2.16 Driving Market Resilience has therefore been identified as a key priority for homes England. This includes access to finance but crucially where HE own sites which are too large to be developed by smaller builders, they will look for opportunities to create smaller parcels which better suit their capacity. They will achieve this improving opportunities for smaller builders to access land, and introduce simpler tender and legal documents on smaller sites to make the bidding process easier.

2.17 Furthermore, the strategic report looks beyond the immediate 5-yr plan and identifies a longer term priority to explore opportunities for, inter alia, removing the planning burdens faced by smaller builders on more complex sites.

⁸ <https://www.gov.uk/government/publications/homes-england-strategic-plan-201819-to-202223>

viii) House of Commons Briefing Paper – December 2018

- 2.18 On 12 December 2018, a House of Commons Briefing Paper titled *‘Tackling the Under-Supply of Housing in England’*⁹ was released. The report addressed all facets of factors influencing the delivery of new homes and addressed in detail ‘Support for SME Developers’.
- 2.19 The Briefing paper recognised the barriers to delivery and the impact that competition for land has on SMEs. The report states that *‘While there is sufficient land to build on, land is scarce in economic terms as its supply is inherently limited and fixed. This leads, it is argued, to developers having to undergo ‘fierce’ competition for land “while remaining uncertain as to what planning permission they will be able to secure.” The price of land is certainly viewed as a barrier to housebuilding. The gain in value that planning permission offers is said to encourage strategic land trading, rather than development, resulting in the most profitable beneficiaries of residential development being the landowner, not the developer. High land prices can, in turn, force down the quality and size of new homes and present difficulties for small and medium sized enterprises (SMEs) when seeking to compete for sites to develop.’* (our emphasis)
- 2.20 The Briefing Paper further acknowledged the over reliance on a small number of developers and considered that *‘This concentration of market power is felt to inhibit competition and can exacerbate the impact of market shocks when all the large firms simultaneously reduce output’.*
- 2.21 The briefing paper recognised that housebuilding requires considerable up-front investment, meaning that *‘in most cases, new housing developers need access to finance. For the housebuilding industry, a particular concern is access to finance for SME developers. The Aldermore Group, a bank specialising in finance to small businesses, have stated: ...smaller developers continue to struggle with access to finance, with a recent industry survey showing that more than 50,000 construction and real estate firms have begun the year in ‘significant’ financial distress...unless more is done by lenders to increase funding to smaller regional developers, the potential for the industry to reach... [the Government’s house building target]...will be less likely.’*
- 2.22 Problems accessing finance can have an impact on house builders’ ability to produce high quality housing, as well as on the overall capacity of the house building industry. As far back as the Budget 2014 a commitment was made to support SME access to finance with the government creating a £500 million Builders Finance Fund to provide loans to developers to unlock 15,000 housing units stalled due to difficulty in accessing finance. In July 2015, the then Housing Minister announced that the Fund would be extended. The Spending Review and Autumn

⁹ <https://researchbriefings.parliament.uk/ResearchBriefing/Summary/CBP-7671#fullreport>

Statement 2015 further extended the £1 billion Fund to 2020/22. In October 2016 the launch of a £3 billion Home Building Fund under which builders, including SME builders, can obtain loan finance to assist with development costs and infrastructure work was established.

- 2.23 The Autumn Budget 2017 announced a further £1.5 billion for this Fund “providing loans specifically targeted at supporting SMEs who cannot access the finance they need to build. The 2017 Budget also said: “The government will explore options with industry to create £8 billion worth of new guarantees to support housebuilding, including SMEs and purpose built rented housing.
- 2.24 The briefing continues that SME developers are less able to withstand market shocks. This is illustrated by the fact that their share of total housing starts declined after each of the last two house price crashes (as quantified in the 2017 HBF report). A factor that would reduce risk and improve confidence in the development process is house price stability.

ix) Revised NPPF - February 2019

- 2.25 In February 2019, the latest version of the NPPF¹⁰ was released. This continues the March 2018 version in respect of the desire to encourage smaller sites to come forward in the plan led system. Paragraph 68 of the NPPF 2019 states:

68. Small and medium sized sites can make an important contribution to meeting the housing requirement of an area, and are often built-out relatively quickly. To promote the development of a good mix of sites local planning authorities should:
- a) identify, through the development plan and brownfield registers, land to accommodate at least 10% of their housing requirement on sites no larger than one hectare; unless it can be shown, through the preparation of relevant plan policies, that there are strong reasons why this 10% target cannot be achieved;
 - b) use tools such as area-wide design assessments and Local Development Orders to help bring small and medium sized sites forward;
 - c) support the development of windfall sites through their policies and decisions – giving great weight to the benefits of using suitable sites within existing settlements for homes; and
 - d) work with developers to encourage the sub-division of large sites where this could help to speed up the delivery of homes.

¹⁰

https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/810197/NPPF_Feb_2019_revised.pdf

- 2.26 The NPPF makes it clear that that small and medium sized sites can make an important contribution to meeting housing requirements in an area. To this end and to encourage small and medium sites, para 68 (a) seeks that 10% of small sites no larger than 1ha should be identified.
- 2.27 MBC needs to respond to this guidance in a proactive way. As detailed above, due to the competition for SMEs to enter the market it is likely that sites being promoted by SMEs will fall into Rural Service Centres or smaller villages away from the main urban areas or areas perceived as having the greatest accessibility. In this respect, paragraphs 77 and 78 (Rural Housing) of the NPPF complement paragraph 68 insofar that they recognise that planning policies need to be responsive to local circumstances and support housing development that reflects local needs. Para 77 continues that to support opportunities for affordable housing, some market housing should be considered to facilitate this. Para 78 further supports that housing should be located where it will enhance or maintain the vitality of rural communities. Policies should identify opportunities for villages to grow and thrive.
- 2.28 Small and Medium sized sites can make a valuable contribution to these locations principally because the approach of SMEs is more flexible than a volume housebuilder and therefore can at a scale and quality that reflect the characteristics of village locations.

x) Speech by Minister of State for Housing, Esther McVey – September 2019

- 2.29 Most recently, in September 2019, the Minister of State for Housing, Esther McVey gave a speech¹¹ at the convention for the residential property sector. Alongside reaffirming the commitment to 300,000 homes per annum, reference was made to improving the quality of housing and posed the following point *‘and what about the jobs and the careers to build all these homes, we need to think about that. We need to be opening up this house building to SME’s, bringing them onboard, bringing it to communities, bringing it to the self-build and bringing in modern methods of construction.’*

B. Pace of Delivery of an SME

- 2.30 SME’s help diversify the market and deliver choice and quality, but they can also deliver at a quicker pace than larger sites. This means that by supporting SME’s into the Maidstone market, MBC can strengthen its Housing Delivery and ensure a steady supply of deliverable sites.

¹¹ <https://www.gov.uk/government/speeches/resi-convention-2019>

2.31 Typically, Esquire Developments aim to take no more than 6 months from receipt of detailed consent to start on site.

2.32 The SME business model is usually set up differently to volume housebuilders. SME's are more flexible in matters such as design and landowner negotiations. In addition, SME's also try to limit their financial risk/exposure. As a result, there are a number of factors that affect an SME's approach to delivering a site. This includes:

1. Cash Flow

- SMEs tend not to land bank as a return on their financial exposure/risk is critical to maintaining a profitable business. In this respect Cash Flow is critical and due to the time lag involved in the return of funds from a development (i.e. once homes begin to be sold), it is essential SMEs seek to reduce the time taken from the point of receiving a planning permission to the point of the sale of a house. This means once an implementable planning consent is secured, SMEs commence as quickly as possible to start on site. Larger PLCs can better carry this risk through multiple sites and numerous pipeline of completions - whereas SME's will have fewer outlets and therefore less regular returns in this respect.

2. Infrastructure Requirements

- Infrastructure requirements on small to medium sized sites are less onerous. This means discussions/contracts with utility providers are less complicated and time taken to implement the required infrastructure is less allowing this element of the build to be quicker.

3. Land Negotiations

- Often small and medium sized sites have fewer legal complications. This includes fewer land registry titles and fewer landowners and as a result fewer negotiations/legal complications that larger sites or larger PLC companies require. This often makes the 'land deal' more straightforward and thus quicker.

4. Flexibility in Product and Process

- Due to an SME's flexible approach to design quality and that standard house types tend not to be adopted, SME's have the ability to be more flexible when it comes to product choices. This not only allows the SME to offer a variety of product or specifically address local characteristics/design requirements, but it also means the SME can respond quickly to any delays or changes to the supply. This is mainly due to the decision makers

being involved in the process and being 'hands-on'. As a result, there is a less hierarchical structure and decisions can be made quickly and efficiently – again reducing time.

5. Working relationships

- SMEs tend to work with a close number of trusted consultants and suppliers who also tend to be SMEs. This not only ensures quality of service and product but allows for open communication when it comes to availability of supplies and delivery of products. This means any potential delays are anticipated and the ability to successfully work through solutions. In addition, the sale of the dwellings tends to be on a more bespoke basis meaning the dialogue and communication between SME and Buyer is also on an open and communicative basis.

6. Sales Rates

- Once construction has commenced, completion rates, which follows sales rates matches the market demand and therefore an SME can build out at the same pace as larger volume housebuilders who adopt the same approach.

2.33 Whilst there is little literature addressing the delivery of small sites, there is a significant amount relating to the delivery of large-scale sites. Nathaniel Litchfield & Partners (NLP) produced a research paper titled 'Start to Finish – How quickly do large-scale housing sites deliver? (November 2016)'¹². The report recognised that *'Large-scale sites can be an attractive proposition for plan-makers. With just one allocation of several thousand homes, a district can – at least on paper – meet a significant proportion of its housing requirement over a sustained period..... But large-scale sites are not a silver bullet. Their scale, complexity and (in some cases) up-front infrastructure costs means they are not always easy to kick start. And once up and running, there is a need to be realistic about how quickly they can deliver new homes'*.

2.34 The report continues that *'past decades have seen too many large-scale developments failing to deliver as quickly as expected, and gaps in housing land supply have opened up as a result'*. NLP suggest that if authorities' Local Plans and five-year land assessments are placing reliance on large-scale developments, including Garden Towns and Villages, to meet housing need, then *"the assumptions they use about when and how quickly such sites will deliver new homes will need to be properly justified."*

¹² <https://lichfields.uk/media/1728/start-to-finish.pdf>

C. Conclusion

- 2.35 The role of SMEs has been fully recognised by Central Government (both in the house of Commons and House of Lords) and the wider Industry (HBF, NLP) in how important their role is to helping deliver the 300,000 homes per annum target. Constraints to SMEs have been identified, including that the plan-led system is orientated away from encouraging SMEs into the market and access to finance.
- 2.36 The 2019 NPPF has provision within it to specifically address this issue with a clear direction to Local Planning Authorities that 10% of all its housing requirements should be on sites that are 1ha or less i.e. approx. 35 dwellings and under per site. This is aimed at SME developers who deliver at or around this scale.
- 2.37 This requirement is welcomed by Esquire Developments - but it is vital that this is transposed into Local Plan allocations - and particularly the recognition that these smaller and medium sites can have in locations which benefit from such an approach, i.e. where there are large parcels of land that could be sub divided into smaller parcels to increase delivery.
- 2.38 In addition, we consider Local Planning Authorities can and should go further to support SMEs and provide for an over-arching policy framework that includes specific topics which SME's can address (i.e. bespoke house types/speedy delivery). Such a policy will allow the Council to apply weight as a material planning consideration to a development site that comes forward by an SME. Policy wording could include bringing together high-quality design based principles, expedient delivery assumptions and fewer reports/conditions. Such a Policy would be attractive to the industry and be a clear signal from the LPA to SMEs that they are open for business.

3.0 RESPONSE TO CONSULTATION QUESTIONS

- 3.1 This section responds to the specific questions posed and sets out the proposed amendments that seek not improve the document.
- 3.2 We support the growth of the Hoo Peninsula and recognise the efforts the Council and the Development Industry is making to deliver sufficient homes in Medway. However, this is a significant undertaking and requires a step change in delivery.
- 3.3 If the Hoo Growth proposals are endorsed by the Council this area will go through significant change, some of which will take time and some of which can come forward at an earlier opportunity. The Council should be conscious of this and understand the role smaller sites can play now in the light of the longer term aspirations of the area.

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

- 3.4 Not a clear sense no.
- 3.5 The document provides for an over-arching and high level vision of growth for Hoo and the surrounding villages. It is possible to understand the general objectives to 2037, objectives which we support.
- 3.6 It is possible to understand the Council's desire to deliver high quality development and in a manner that reflects the local characteristics, again which we support. It is also possible to understand the 'broad locations' for where this growth may occur.
- 3.7 However, the 'devil is in the detail' and at present the language and associated diagrams and illustrations are quite generic and lack the necessary detail to fully understand with clarity, what the Hoo Peninsula will be like in 2037. This is in part because the site does not identify specific sites but also because the document does not undertake a character assessment of each individual and unique location - in order to help the reader understand what specific characteristics are to be maintained and/or enhanced and what individualises Chattenden from Hoo from High Halstow.
- 3.8 By way of example, Page 13 of the document considers growth in Chattenden and provides 6No. bullet points. The first bullet point simply states '*maintain the existing village character*'. There is no specified growth figure relating to Chattenden (of the 12,000 quoted elsewhere), and so it is firstly difficult to understand what quantum is envisaged in this location. Secondly. The 2nd bullet refers to '*a compact development*' and the last bullet point refers to '*housing typologies will*

comprise mostly terraced and semi-detached houses to create a sense of enclosure and encourage communal uses’.

- 3.9 The above bullet points provides no real guidance what is expected to be delivered from specific sites in Chattenden and what Chattenden will look like in 2037 other than that we know Chattenden will grow by ‘an amount’.
- 3.10 The document therefore falls short in providing a clear sense of what the Peninsula will be like in 2037.

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

- 3.11 We consider that the vision could be more specific about describing the vision in the context of Hoo Peninsula. This includes references to Hoo and ‘names and places’ in the 6No. Vision and Aspirations on page 2 of the document.
- 3.12 There are some references to how certain principles relate to Hoo Peninsula but these could come through the document more comprehensively. By way of example, ‘Principle 1: Landscape Led Development’ includes 6No. bullet points. It is not until the last bullet that the specific villages on the Peninsula are referenced. The preceding 5 bullet points are all positive principles (which again we support), but they lack specificity to Hoo and therefore unfortunately could be a vision that describes anywhere.

3. *Does the vision reflect your priorities?*

- 3.13 We support the delivery of growth in Hoo and that this is supported by the necessary infrastructure. We also support the desire that Hoo is a vibrant and attractive place to live and work. We also support the notion that there is a desire to deliver high quality developments. That reflect their unique settings.
- 3.14 We consider further reference could be made to SME Housebuilders and about improving and increasing the diversity of the housing choice on the Peninsula by supporting a vision that encourages all sizes of housebuilders.
- 3.15 Naturally, there will be sites of a significant size being promoted by National Housebuilders and PLCs. These sites are of course important to deliver the scale of housing growth required within the envisaged timescales, but they will take time and come forward with limited design opportunities/variations.

- 3.16 The Framework document provides a significant opportunity to encourage SME Housebuilders into the market. SMEs will play a critical role in the delivery of high quality housing and deliver an alternative mix of uses or products i.e. single storey dwellings, commercial premises.
- 3.17 It is our experience, through the SME Network that there are a number of keen SME Housebuilders wishing to develop on the Peninsula and in Medway, and it is likely that there are a number of SME sites that are located on the fringes of the identified growth areas. As mentioned previously, these sites should not simply be overlooked, say in sustainability credentials terms, because this are will eb subject to change and these sites can come forward earlier to complement the delivery of the larger volume housebuilders including offering a choice of product to the market.
- 3.18 We would therefore welcome reference to encouraging SME's to bring forward development opportunities.

4. *Is it concise and easy to understand?*

- 3.19 The document is concise, but potentially at the risk of being understood. By way of example, the document, rightly so, discusses the importance of the new Railway Station and how this will create significant modal shift. It further identifies the station as an area of change, with contemporary living and a mix of services. It further encourages that this is the are of highest density.
- 3.20 However, the station is located on the northern edge of the main growth area (Hoo) and somewhat sits in a rather isolated position. Whilst it is recognised that the strategy utilises the existing railway line and former railway halt (which we support), the diagram relating to Principle 1 Landscape Led, suggests that the Railway station is to be surrounding by Green Infrastructure wedges, resulting in pushing the majority of development away from what is to naturally become the day to day hub of the new town.
- 3.21 Furthermore, when the Station Neighbourhood Character is viewed, there is only a limited buffer or at least a significantly reduced buffer which appears to follow the line of existing Electricity Pylons showing. This therefore represents a conflict between Principle 1 and the character area.
- 3.22 Whilst we do not object to the identification of this contemporary living and development being located between Hoo and the Station, it is important to ensure that the illustrative material is consistent to enable the reader to understand the vision and expectation of how development may occur in this location.

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

3.23 No comment.

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

3.24 In addition to the recognition of the role SMEs can play in the delivery of the vision, we consider Neighbourhood Character Areas could be improved as follows:

Village Living in Chattenden / Parkland Living in Deangate

3.25 These two character areas are located adjacent to each other and describe the opportunity of developments that are compact and preserve Chattenden's rural identity (Chattenden) and provide a distinctive neighbourhood benefiting from its woodland setting and a unique opportunity for innovative design (Deangate).

3.26 The site included in Appendix A - Lodge Hill, is located to the north and east of these two character areas (as shown in Appendix D). The site sits within an area of overlap where the two character areas meet. It therefore represents a logical location for development.

3.27 The emerging proposals are for a development of 9 dwellings redeveloping existing redundant and derelict outbuildings in a linear form reflecting a traditional farmstead design approach and complementing its semi rural surroundings. The remaining part of the site propose a self-build scheme ranging from 7 – 14 dwellings (depending on final purchaser). The scheme is designed to be flexible to support 'younger' self builders with access to limited finance or self builders that wish to build on a larger 'dual' plot.

3.28 The emerging scheme meets the identified visions for both Chattenden and Deangate. For Chattenden it reflects the rural setting in a compact manner and would develop a site that already has built form upon it. For Deangate, the self build element allow for the opportunity to be innovative and individual in design (based on a Design Brief) that will be orientated towards its natural setting.

3.29 The delivery of such a mix-tenure scheme would also deliver choice to the market including not only a small scale development of high quality but will also go some way to meet Medway's Self-Build register, which presently stands at 81 plots required (as at 30 October 2019).

3.30 It is noted that since 2016, only 11 self-build plots have been granted planning permission and this scheme could therefore double that permitted in Medway in 3.5 yrs.

3.31 The scheme would positively add to the vision of the area and is being actively promoted by Esquire Developments. We therefore consider that additional text could be inserted into these two character areas to:

- Reflect support for SME developers;
- Reflect support for Self-Build developments;
- Ensure the growth areas include the site.

Contemporary Living by the New Railway Station

3.32 We consider the delivery of the new railway station is a significant opportunity. We note that generally, a significant proportion of the proposed growth is located some distance from the station centred around the existing settlements of Hoo (to the south) and Chattenden.

3.33 Whilst it is recognised that the location of the station is fixed by the existing infrastructure, and that large sites are seeking to 'bolt onto' existing settlements, we consider the framework could be improved by the recognition of additional land located in close proximity to the station reflecting that there is available, suitable and deliverable land for development that can support a mix of uses and be delivered in a timely manner.

3.34 The site identified in Appendix B (Former Sturdee Sports Club) is such a site. Appendix E identifies where the site is located on the current character area plan. It is located immediately opposite where the built development is proposed. The site is bound by Stoke Road and the existing Electricity pylons which form a strong landscape feature in this area.

3.35 It is unclear at present why land south of Stoke Road is not identified for potential development at this location. This is in the light that the site lies immediately opposite the extent of the proposed railway character area and just east of the 'Rural Town Living in Hoo' character area. It is approximately 1,500m from the new Railway Station and closer to the station than a significant proportion of other proposed development areas.

3.36 This area is considered a wholly logical extension and should be included as part of the 'Contemporary Living by the Railway Station' character area.

3.37 As shown in Appendix B, the site proposes a mix of uses that will complement the existing and future developments. This includes the provision of approximately 100 residential dwellings, rural commercial space and a children's nursery. Esquire Developments is presently delivering a similar mixed-use scheme in nearby Cliffe Woods and understand the local market.

- 3.38 The provision of commercial space will meet the objectives of the Railway character area by delivering employment opportunities in close proximity to the railway station. Furthermore, the delivery of a children's nursery will not only serve the wider area (being located near to the station for convenient drop off and commute trips), but it is also noted that the railway character area ensures that it will deliver homes suitable for '*professionals from single to young families*' i.e. the character area is promoting parents with young children that will continue to work and will therefore naturally require Nursery provision.
- 3.39 The site is considered to be able to come forward in accordance with other framework principles, including the Landscape Led principle as it can provide for the green buffer areas aligned with the proposed character area.
- 3.40 It is considered that the Railway Character area can be improved by:
- Reference to support SMEs;
 - Support for mixed use schemes;
 - Support for delivering Nursery provision;
 - Extend the character area to include the opposite side of Stroke Road.

Village Living in High Halstow

- 3.41 We support the character area of Village Living in High Halstow. This is in the light of its proximity to the new station and providing for choice of location on the Peninsula. We specifically support the bullet point that '*The new homes will be divided largely into two parts, new dwellings immediately adjacent to the existing High Halstow and homes closer to Sharnal Street, taking advantage of the close proximity of the new station*' but consider this bullet point could be improved further.
- 3.42 We consider that the bullet point could be improved by making it clear that development could be accommodated along all of Sharnal Street including the east side of Sharnal Street and not simply confined to 'two parts'. The east side of Sharnal Street already accommodates built form and there are suitable sites located in this area that can accommodate some growth. Such a site is found in Appendix C which, whilst is located within the illustration (See Appendix F), the supporting text does not necessarily reflect this.
- 3.43 Sharnal Street as a whole (i.e. both east and west of the street) should be recognised in this document to be appropriate for developmental. This area should not be reliant on a single or a few large sites or developer to deliver all the housing. This will not bring variation to built form or

choice to the market. Furthermore, given the amount of built form on the east side of Sharnal Street, there maybe opportunity for brownfield development and this opportunity should be encouraged.

3.44 In addition, Sharnal Street itself spurs off the roundabout to the south heading directly towards the new station. Sharnal Street is a dead-end serving a limited number of properties. It is an attractive option for pedestrians and cyclists heading to the station and is away from the main road. The alignment of Sharnal Street lies on the east side of the roundabout and therefore it is logical that if Sharnal Street is recognised as a good opportunity to provide safe links and access to the station, locating development on the same side of Sharnal Street is appropriate. This should come across more clearly in the document.

3.45 It is therefore proposed that the bullet points is improved as below:

- *The new homes will be divided ~~largely into two parts~~, with new dwellings immediately adjacent to the existing High Halstow and homes closer to Sharnal Street, taking advantage of the close proximity of the new station and the existing built form that is present.*

4.0 SUMMARY

- 4.1 These representations are submitted by Esquire Developments, a local multi award winning SME housebuilder active in Medway and the Peninsula.
- 4.2 Esquire Developments has control of land and is actively promoting suitable, available and deliverable sites at Chattenden, Hoo and High Halstow. The sites vary in size and mix of use including, residential, self build, commercial and children's nursery.
- 4.3 We support the Councils desire to deliver the Growth envisaged on the Hoo Peninsula. We support the identified infrastructure upgrades identified as being required and particularly the delivery of the new Railway Station, which will result in a significant modal shift pattern for the Peninsula.
- 4.4 We further support the vision that future growth will be of a high quality and in a sustainable form.
- 4.5 We are disappointed that there is no reference to SME Developers in the document or what role SME Housebuilders can play in the delivery of the growth on the Peninsula.
- 4.6 We consider improvements could be made to the vision as a whole by consideration of additional sites/areas, including those put forward by Esquire Developments in these representations to help deliver sites at pace and with a mix and choice of products to the market.
- 4.7 We have proposed amendments to character areas including those at Chattenden, Deangate, Railway Area and High Halstow.
- 4.8 We consider that for the vision to be effective, further detail will be necessary that sets out the specific sites, phases and uses of the area either through the emerging Local Plan or Area Action Plan or a further iteration of this document.

APPENDICES

APPENDIX A

Lodge Hill, Chattenden Emerging Development Proposals

Key

- Site Boundary
- - - 10-14 Self Build Serviced Plots
- - - 9 Private Houses in Bespoke Farmstead Development



ON
ARCH
TECT
URE

onarchitecture.co.uk
info@onarchitecture.co.uk
01227 634334

Client Details
Esquire Developments

Project Title
Land at Chattenden, Lodge Hill, Medway

Drawing Title
Site Layout Plan

Scale	Date	Drawn	Checked
1:1250 @ A3	Dec 19	RT	
Project Number	Drawing Number	Drawing Revision	
19.232	SK03	A	

Canterbury Studio: Logan House, St Andrews Close, Canterbury, CT1 2RP
London Studio: Ink Rooms, 25-37 Easton Street, Clerkenwell, WC1X 0DS

Site Layout Plan
Land at Chattenden, Lodge Hill, Medway

APPENDIX B

Sturdee Sports Club, Stoke Road Emerging Development Proposals



- ① Pylon
- ② Emergency Access
- ③ Commercial Units
- ④ Landscape Buffer
- ⑤ Nursery
- ⑥ Central Green
- ⑦ Parking Court
- PD Private Drive
- ▭ Affordable Units



ON
ARCH
TECT
URE

onarchitecture.co.uk
info@onarchitecture.co.uk
01227 634334

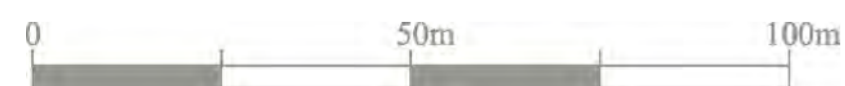
Client Details

Project Title
Proposed redevelopment
Sturdee Sports and Social, Hoo.

Drawing Title
Site Layout

Scale 1:1000 @ A2	Date January 2020	Drawn KE	Checked
Project Number 19.219	Drawing Number 02	Drawing Revision	

Canterbury Studio: Logan House, St Andrews Close, Canterbury, CT1 2RP
London Studio: Ink Rooms, 25-37 Easton Street, Clerkenwell, WC1X 0DS



Site Layout

Proposed Redevelopemnt at Sturdee sports and social, Hoo, Kent

APPENDIX C

The Hollies, Sharnal Street High Halstow – Emerging Development Proposals



ON
ARCH
TECT
URE

onarchitecture.co.uk
info@onarchitecture.co.uk
01227 634334

Client Details
Esquire Developments

Project Title
Proposed Residential Development,
Sharnal Street, High Halstow

Drawing Title
Sketch Site Layout Plan

Scale	Date	Drawn	Checked
1:500 @ A3	April 2020	RD	

Project Number	Drawing Number	Drawing Revision
20.014	SK01	C

Canterbury Studio: Logan House, St Andrews Close, Canterbury, CT1 2RP
London Studio: Ink Rooms, 25-37 Easton Street, Clerkenwell, WC1X 0DS

Sketch Site Layout Plan

Proposed Residential Development, Sharnal Street, High Halstow

APPENDIX D

Extract of Character Area Chattenden/Deangate



APPENDIX E

Extract of Character Area Contemporary Living at Railway Station



APPENDIX F

Extract of Character Area High Halstow



Date: 11th May 2020

To: futuremedway@medway.gov.uk (by email only)



Dear Madam/Sir,

RE: Planning for growth on the Hoo Peninsula consultation

This letter is written in response to the consultation on the *Planning for Growth on the Hoo Peninsula* document. Firstly, given the high level nature of this document and lack of specific detail it has not been possible to undertake a proper assessment of the strategy for development on the Hoo Peninsula. Below are Kent Wildlife Trusts concerns and our broad comments for your consideration as the scheme progresses.

Vision

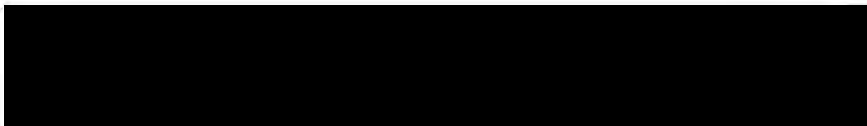
The proposed vision makes no reference to biodiversity, nature, green space or the environment. The Hoo Peninsular is of high value for biodiversity, demonstrated by the international, national and local designations and presence of protected and notable species. Consequently, biodiversity should be a priority at every stage of development planning on the Hoo Peninsular, to ensure that all these sensitive receptors are protected and enhanced. Further, any vision for development should align with the Government's commitments, as set out in the 25 Year Environment Plan, to deliver biodiversity net gains and to create nature recover networks. Both of these commitments will be legislated by the upcoming Environment Bill and strategic planning at these early stages will be essential for delivering the best outcomes for biodiversity. At present, both the vision and the plan for growth on the Hoo Peninsula are predominantly people focused and not biodiversity focused. We would suggest that this be incorporated into the vision through the following amendment; *"By 2037, Hoo St Werburgh will be a thriving rural town, **designed to support the environment and biodiversity and be sensitively integrated into the extraordinary landscape of the Hoo Peninsula.** [...]"*.

Ecological Impact Assessment

An in-depth, strategic review of potential environmental impacts of development on the Hoo Peninsular should be undertaken. Without details of likely impacts, it is not possible to assess Medway's vision for growth. An Ecological Impact Assessment (EcIA) should be undertaken. EcIA should follow the CIEEM guidance 'Guidelines for Ecological Impact Assessment in the UK and Ireland: Terrestrial, Freshwater, Coastal and Marine Version 1.1'. We particularly wish to draw your attention to p.13, which sets out what should be covered by the impact assessment, including the identification of cumulative impacts and significant effects without any mitigation. Where significant impacts alone or in combination are identified then the mitigation hierarchy should be applied. We wish to stress that the impact assessment should inform further evolution of project design. The impact assessment and application of the mitigation hierarchy should not be retrofitted to the existing development strategy.

The EcIA should include impacts to all statutory and non-statutory designated sites and priority species and habitats. We wish to draw your attention to the close proximity of Grain Pitt Local Wildlife Site. This reedbed supports more than three Kent Red Data Book 3 bird species. Grain Pit is a brownfield site which falls into the priority habitat of 'open mosaic habitats on previously developed land'. Consideration should be given to this Local Wildlife Site to avoid both direct and indirect impacts from increased population in the surrounding area.

Nationally and Internationally designated sites



Paragraph 171 of the National Planning Policy Framework states that: *“Plans should: distinguish between the hierarchy of international, national and locally designated sites; allocate land with the least environmental or amenity value, where consistent with other policies in this Framework; take a strategic approach to maintaining and enhancing networks of habitats and green infrastructure; and plan for the enhancement of natural capital at a catchment or landscape scale across local authority boundaries.”*

Medway Estuary and Marshes Special Protection Area (SPA), Ramsar site and Site of Special Scientific Interest (SSSI)

Due to the lack of detail within the plans, it is not possible to assess all of the potential impacts of the proposals on the qualifying features of the Medway Estuary and Marshes SPA, Ramsar and SSSI. One likely impact will be recreational disturbance. Mitigation should be provided through the Strategic Access Management and Monitoring Plan (SAMM). In addition, high quality, multifunctional green space should be provided to further mitigate against disturbance by encouraging residents to use alternative sites. Recreational pressure and other potential impacts to the SPA and Ramsar should be assessed through a Habitats Regulations Assessment.

Chattenden Woods and Lodge Hill SSSI

We are particularly concerned about the impacts of the Chattenden Development on Chattenden Woods and Lodge Hill SSSI. Due to the high level nature of the consultation document, and the inaccuracies in the mapping of the SSSI and the development (including new roads) it is not possible to provide detailed comments. Please accept our overarching comments of key considerations relating to impacts to Lodge Hill SSSI.

- *Public access:* We are greatly concerned about increased recreational pressure on the SSSI and its sensitive features, including nightingale.
- *Cats:* Residential housing in this location poses increased risk of cat predation within the SSSI. This is particularly a concern for nightingale, which is a designated feature.
- *Lighting:* Noise and light disturbance are likely to result from both residential housing and from new access roads. Proposed development should be designed to avoid light spill into the SSSI. This could be achieved through the use of buffer zones, sensitive lighting schemes and development design with the SSSI in mind.
- *Mitigation and compensation:* As stated above, due to the high level nature of this document it is not possible to determine proposed mitigation and compensation measures.

Tower Hill to Cockham Woods SSSI

It is noted that this SSSI is inaccurately labelled within the consultation document. It appears to have been referred to as ‘Beacon Hill Wood SSSI’ and ‘Cockham Wood SSSI’. We advise that designated sites be accurately mapped and labelled.

The condition assessment undertaken by Natural England in 2009 indicated that one of the four SSSI units was in unfavourable – declining condition. The assessment stated that *“There are problems with recreational activities causing erosion and destruction of the ground flora in this unit. Lots of tracks and slipways possibly caused by trail bikes were noted, which has created a lot of bare ground. This recreational damage is mainly on the land between the footpath to the West and the area in the East of this unit. Several bonfire sites were also noted, surrounded by bare ground.”* Development on the Hoo Peninsular, and in particular the ‘Riverside Living in Cockham Farm’ must support the recovery of the SSSI and its interest features. The proposed country park should not promote or encourage access to Cockham Woods SSSI and should serve as a suitable and attractive alternative green space. It may be useful to consider guidance for Suitable Alternative Natural Green Space (SANGS) when designing the country park although it is acknowledged that mitigation for impacts to a SSSI do not require SANGS.

Green infrastructure

The Hoo Peninsular is arguably the most sensitive location for housing development with regards to biodiversity in Medway. Therefore, there should be a proportionate focus on biodiversity when preparing a green infrastructure plan and the overarching masterplan. Trade-offs between the need for public access and the need to protect and enhance biodiversity must be considered, with alternative provision of recreational space provided where necessary. The green corridors depicted on page 9 do not provide sufficient detail to determine if the green space provision is appropriate or sufficient to meet the requirements of the National Planning Policy Framework, paragraph 174 which states that plans should: *“(a) Identify, map and safeguard components of local wildlife-rich habitats and wider ecological networks, including the hierarchy of international, national and locally designated sites of importance for biodiversity; wildlife corridors and stepping stones that connect them; and areas identified by national and local partnerships for habitat management, enhancement, restoration or creation; and (b) promote the conservation, restoration and enhancement of priority habitats, ecological networks and the protection and recovery of priority species; and identify and pursue opportunities for securing measurable net gains for biodiversity.”* Green space provision within developed areas should also be highlighted within the plans to prevent ‘concrete jungles’ devoid of nature and to provide climate change mitigation and wellbeing benefits. To achieve maximum benefits for people and wildlife green infrastructure should be designed to be multifunctional, where appropriate.

We refer you to our previous comments provided in response to Medway’s Green and Blue Infrastructure Vision consultation, dated 27th September 2019. Kent Wildlife Trust would be happy to engage with you further on detailed design and implementation of a green infrastructure strategy. We would also welcome the creation of a ‘green spaces working group’ to allow nature conservation organisations to input and advise on design and creation.

Net gain

The Government set out its commitment to achieve Biodiversity Net Gain within its 25 Year Environment Plan, which will be mandated within the upcoming Environment Bill. The Environment Bill requires all future schemes to deliver a mandatory 10% biodiversity net gain. We would advise that the provision of net gain is considered at the early stages, with particular consideration to the provision of onsite net gain delivery. We would advise that a strategy for the delivery of Biodiversity Net Gain is prepared to guide developers on the most suitable locations. This coordinated approach would allow for heightened opportunities for biodiversity in this sensitive location and contribute to creating connectivity through the landscape. We would advise that this strategy for net gain be mapped to provide clarity for consultees and stakeholders. Kent Wildlife Trust would be happy to engage with you further in order to incorporate this into your plans.

I hope that the above proves useful in informing scheme design. Please do not hesitate to contact me for clarification on any of the points raised within this letter.

Yours sincerely,

Nicky Britton-Williams
Wilder Towns Officer
Kent Wildlife Trust

[Redacted signature]

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:Dennis Adey

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?

No ☐

Comments: This is what Medway Council want and is not representative of what many people who live on the Hoo Peninsula would want in the future. My wife & I object strongly to this proposed development of what is a mainly rural area. Is Medway Council determined to turn all of the Medway area into an urban environment with no countryside left? Are they determined to concrete over every bit of land in the Medway area? The Hoo Peninsula should be left mainly untouched as the lungs of Medway with countryside left for wildlife to be sustained, food grown & people to enjoy the open air with good views & lovely peaceful walking & cycling routes.

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

Yes ☐

Comments:

3. Does the vision reflect your priorities?

No ☐

Comments: My wife & I's priority is to retain a peaceful rural existence in High Halstow village (not turning it into a small town). We moved from a busy urban town in 1992 for a quieter life & have enjoyed living in this village (including bringing up our two children [now grown up] who both attended our village school). When we moved here we had clear views over countryside in 3 directions. About 8 years later one view was lost with the Abbey & Wilcon housing developments behind us. More recently we have lost another view with the Redrow development. Our one final view is left over open countryside & we can clearly see to the Isle of Sheppey. If you proceed to build all the homes proposed on the land between Britannia Road & Christmas Lane (to double the size of our village) we will have no views left & it will feel like we are back in an urban environment that we do not want.

4. Is it concise and easy to understand?

Yes ☐

Comments: Mainly yes but there are two areas in your document that do not emphasise enough the adverse effects that they will have on people living nearby.

1. The transport hub of a new railway station at Sharnal Street (which is part of High Halstow) will be much bigger than it appears on your plan. We have seen other pictures that show far more extensive parking facilities, businesses, shops & cafes etc. It looks like it will be a big development in our village.

Ref:

2. Your pictures & description of what is proposed in High Halstow give the impression of the rural character remaining & you even use the wording 'overall housing density will remain low'. This cannot be the case with the quantity of houses proposed. We can already see what has gone wrong with the Redrow development being built at the end of our road with far too many houses packed closely together with small gardens & many without views.

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

Comments: Now that we have all had to experience the effects of the Coronavirus since you issued this document then it is essential that Medway Council's vision for the Hoo Peninsula is altered significantly. Success can then be measured by Medway Council achieving a new vision necessary by the effects of this virus on nearly everyone.

We are to have the biggest recession for about 300 years so to spend council money on expanding the Hoo Peninsula would appear to be a very poor use of funds. These funds can be put to better uses supporting the effects of the virus which would not be by building more houses & increasing transport links (including the new railway). Finances will be so poor for many people for a significant number of years that growth in housing & transport infrastructure will not be necessary.

It has been proved that the virus spreads quicker in urban areas so to urbanise the Hoo Peninsular would put more people at risk if another virus occurred. The World Health Authority say that there could be more viruses in the future of different types & trying to control them will be difficult.

As result of Coronavirus Medway Council (like a lot of other councils & big businesses) is unfortunately losing money. Although you have succeeded in getting the £170m from the government for transport etc on the Hoo Peninsula that money could be used to offset your losses & not impact on council tax payers. Although this was previously agreed for transport etc it should be possible to change this legally between the UK Government & Medway Council for using the funds more appropriately. Coronavirus has significantly altered what is now required.

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

There should be no further growth on the Hoo Peninsula. The recent huge housing developments allowed at Hoo have ruined it & my wife and I know of people who have lived there quite a long time & are trying to move well away.

Growth can have a very negative impact & is not always a good idea. A better vision would be to prevent growth on the Hoo Peninsula for the following reasons:-

The population of the UK needs to be reduced to ensure there are enough resources to go round now & for future generations. The Medway area has far too many people in it but fortunately at present there are not too many on the Hoo Peninsula. Busy places are not very pleasant to live in.

The Hoo Peninsula has a lot of Grade 1 agricultural land that should not be built on. The production of food in the UK will become more necessary than housing.

Much of the Hoo Peninsula land is not suitable for building houses on as it is prone to flooding.

There is a lot of wildlife on the Hoo Peninsula & it has two nature reserves. All this should be protected by not building more houses.

The Hoo Peninsula is a good rural area & there are not many left like this in Kent, it should be protected from further development. It is a pleasant place to walk & cycle through. It should be left as the lungs of the Medway area so that people can enjoy space, views, wildlife & fresh air. You do not get this in an urban area. Countryside should not be destroyed to appease government housing targets.

Who is going to buy all these houses that Medway Council propose to build on the Hoo Peninsula? Where are they all to come from? The council probably feel forced by government but the recent effects from the virus probably mean that forecasts for future housing are far too high.

Ref:

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

Our fears for the future (including future generations) is that North Kent will be completely urbanised from London right out to the Medway Area (including the Hoo Peninsula).

Presently if you leave High Halstow you pass through a number of pleasant villages (Cooling, Cliffe & Lower Higham) with nice countryside around before you reach Gravesend & the busy urban areas leading to London. Compare this with the other side of the River Thames in Essex where there is continuous urban development all the way from London to Southend. Having previously worked in South Essex for over 30 years (now retired) I could see how all the countryside had gone & how busy it was there.

You propose a new railway transport link at Sharnal Street but who will that serve? If it is easy commuter access to London; will that be required as many people work from home & many large companies have moved their HQ's out of London.

There is an extra Thames Crossing proposed at Chalk (near Gravesend). If this goes ahead it could encourage a lot of urban development around it (as at Dartford). It will not be far from the Hoo Peninsula & could therefore encourage linked development alongside the River Thames between Gravesend & Medway (including the Hoo Peninsula).

My wife & I enjoy living on the Hoo Peninsula including walking and cycling round its countryside. Medway Council should question itself on whether it is necessary to lose this prime countryside because when it is gone it will be gone for ever.

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.

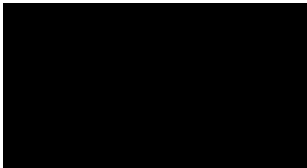
Details about how your information will be held and used are found on the link below:
https://www.medway.gov.uk/info/200133/planning/714/planning_service_privacy_statement

Part 1 – Your Details

Name: Mr P Buckley

Name of organisation (if applicable):
CPRE Kent

Address:

A black rectangular box redacting the address information.

Email:

A black rectangular box redacting the email address.

Phone:

A black rectangular box redacting the phone number.

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:

See response at 7 below

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

Yes ☐

No ☐

Comments:

See response at 7 below

3. Does the vision reflect your priorities?

Yes ☐

No ☐

Comments:

See response at 7 below

4. Is it concise and easy to understand?

Yes ☐

No ☐

Comments:

See response at 7 below

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

Comments:

See response at 7 below

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

See response at 7 below

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

The proposals need to be grounded in hard evidence which is not available at the present. Without this it is not possible to comment on the proposal.

Ref:

Evidence will be necessary on matters such as:

Viability of the project.

There is no information on the cost of the suggested new roads and rail link, as well as open space etc. It is therefore not possible to know if the scale of the proposed development will be able to fund the necessary infrastructure.

Ability to deliver the road and rail infrastructure by 2024.

The brochure states that:

'Hoo Peninsula and extended employment areas depend on strengthened connections and significant upgrades to transport. This was set out in the council's successful Housing and Infrastructure Fund bid which identified highway improvements to the existing A228 and A289, a new road and the reinstatement of rail passenger services. The improvements will be in place by 2024.'

The new road and rail infrastructure will require orders under the Highways Act, and Transport and Works Act 1992.

Given that it is now 2020 it is difficult to know if these orders can be obtained and works undertaken in the short time period to 2024.

Housing Trajectory

There is no evidence that the 12,000 additional homes could be built within a 20-year period. 20,000 homes over a 20-year period implies a build out rate of 600 homes a year. This is the same as achieved over the past 5-years across the whole Council area. By comparison it has taken the Ebbsfleet Development Corporation 4 years to achieve 600 dwellings per annum. That is with the benefit of the Ebbsfleet HS1 station, proximity to A2 and three development areas.

The latest Office for National Statistics sub-regional population projection for Medway (2018-based released on 24 March 2020) indicate a significant fall in projected population relative to the 2014-based projection. This is likely to mean that far fewer homes will need to be provided and could call into question the need for this new community.

Ability to create a sustainable community

With regard to sustainable transport the PRINCIPLE 2: ACCESS AND MOVEMENT states 'The enhanced bus services have the potential to reduce over 7 out of 10 commuting trips currently by car to 5 out of 10 in the future.'

The UKFIRES report Absolut Zero (Delivering the UK's climate change commitment with incremental changes to today's technologies) published in November 2019 sets out that for the UK to achieve zero carbon emissions by 2050 road use will need to be at 60% of 2020 levels - through reducing distance travelled or reducing vehicle weight; and that total energy required to transport food will need to be reduced to 60%. <https://ukfires.org/absolute-zero/>

The number of commuting trips will have to be reduced to 4 out of 10 not 5 out of 10 set out in the consultation document.

Maidstone Borough Council Local Plan Review Scoping Themes & Issues Consultation July 2019 at page 52 sets out that "Research has shown that travel habits develop very quickly in new developments and once people have chosen their travel mode, they tend to stick to it."

The bus image on page 10 of the consultation document entitled 'more efficient and better connected bus services' is of a Fastrack A bus at the Bridge Community, Dartford. The Fastrack route was built before development commenced and a regular walk on service with subsidised fares for residents provided to encourage residents to use public transport.

Ref:

The consultation document does not provide any evidence that the scale of development will support a regular walk on bus service or that it will be available early on in the development to reduce car dependency.

There is no evidence that a regular train service is deliverable. We understand that the North Kent line has no additional peak time capacity.

Significant improvements to public transport will be required to enable new residents to travel to work, school, medical care etc.

With regard to walking and cycling routes the Framework Plan does not show any links within or beyond the new settlement. It is therefore not possible to know whether residents will be able to safely walk or cycle to work or school beyond the boundaries of the new settlement.

Flood Risk

The proposed new settlement lies on the banks of the Medway estuary. It would appear that the new development will not be located in areas of flood risk. The Planning Practice Guidance sets out that residential development should be considered for a minimum of 100 years unless there is a specific justification for considering a shorter period – for example; the time in which flood risk or coastal change is anticipated to impact on it (Paragraph: 026 Reference ID: 7-026-20140306).

The Council's Local Flood Risk mapping undertaken by Capita Symonds/URS and published in 2013 at Figure 3.1 shows that there were 17 local flood incidents in the existing village of Hoo St Werburgh, and Figure 3.4 shows that land to the north east of the village and along the railway line were at high and very high risk of groundwater flooding.

Scientists consider that estimates of global sea level rise could rise far more than predicted. The National Academy of Sciences of the USA June 2019 research article states 'We find that a global total SLR exceeding 2m by 2100 lies within the 90% uncertainty bounds for a high emission scenario. This is more than twice the upper value put forward by the Intergovernmental Panel on Climate Change in the Fifth Assessment Report.'

This year's autumn and winter weather resulted in severe flooding in many parts of the country.

Scientific predictions and this year's winter flooding suggest that a flood risk assessment will be required to evidence that the new community will not be at risk from tidal, fluvial or surface flooding. consideration will need to be given to the Environment Agency flood risk maps. It will be important that development is not located in areas that are likely to be at risk of flooding in the future or result in flood risk elsewhere.

Climate Change

On 12 June 2019 the Prime Minister announced that the UK will eradicate its net contribution to climate change by 2050. A statutory instrument was laid in Parliament which amended the net UK carbon account target from 80% to 100%¹.

The new community will need to be designed to help the country meet this target.

Air Quality

There is no evidence how improvements to the local road network will contribute to the reduction of queuing on Four Elms Hill and that this will address air quality issues related to the Air Quality Management Area given that 12,000 new homes could well increase traffic on the AQMA.

¹ The Climate Change Act 2008 (2050 Target Amendment) Order 2019: 2.—(1) Section 1 of the Climate Change Act 2008

Ref:

Social integration

At 2011 the Peninsula Ward within which Hoo St Werburgh is located had 6,100 households. The consultation document proposes 12,000 new dwellings over a 20-year period. This will treble the number of households on the peninsula. There is no indication how social integration will be achieved.

“PLANNING FOR GROWTH” - HOO PENINSULA CONSULTATION DRAFT

1 INTRODUCTION

- 1.1 Rapleys LLP is instructed on behalf of AC Goatham & Sons to submit representations to Medway Council, as LPA, in relation to the consultation draft, entitled “*Planning for Growth*” on the Hoo Peninsula (“Draft Document”). The intended status of any adopted version of this document is presently unclear. For present purposes it is treated as an intended draft/supplementary planning document or guidance.
- 1.2 These representations follow on from earlier representations prepared by Rapleys LLP in respect of the Regulation 18 consultation (June 2018).
- 1.3 These representations include consideration of the following:
 - Present stage of local plan-making process and its onward scheduling
 - Housing Infrastructure Fund
 - LPA’s overarching vision for development of the Hoo Peninsula
 - Constraints to development of the Hoo Peninsula.
 - Transport capacity
 - Pedestrian and cycle provision
 - Air quality and climate change implications
 - SSSI and landscape implications
 - Green infrastructure provision
 - Sustainability
 - Review of housing delivery and supply, encompassing SLAA 2019

2 LOCAL PLAN-MAKING PROCESS

- 2.1 Following regulation 18 consultation in Summer 2018, the LPA is yet to publish a draft Local Plan for regulation 19 consultation. The timescale for doing so has progressively slowed considerably. It is now very unlikely that the LPA will meet even their revised target (Local Development Scheme December 2019) of “*Summer 2020*”. The consultation document now broadly advises publication “*later this year*”. This is very unlikely to prove achievable.
- 2.2 Any adoption of a (sound) local plan even by December 2021, is now almost certainly unachievable.

3 OVERARCHING VISION FOR DEVELOPMENT ON THE HOO PENINSULA

- 3.1 Building on the regulation 18 consultation document (Development Strategy 2018), the Draft Document seems to continue to pursue ‘Scenario 3’ within the context of concentrated housing delivery of the Hoo Peninsula. This is despite the very recent approval by the Council of a sizeable housing scheme (202 units) at Land South of Lower Rainham Road.
- 3.2 The Draft Document is notably very limited in detail. It appears instead to adopt the format of an uninformed, very high-level ‘vision’ document. It does not incorporate any considered assessment but merely outlines the one proposed option: for the provision of up to 12,000 homes on Hoo Peninsula. Disappointingly, no consideration is given to any alternatives for the delivery of housing.
- 3.3 Quite aside from the demerits of concentrating housing development, of such a scale, on Hoo Peninsula, this represents a fundamentally flawed approach since the growth strategy will ultimately prove dependent on very significant infrastructure delivery and upgrading - of which, again, conspicuously no detail has been

provided by the Council. If any one of the significant and interdependent infrastructure projects (whether road or rail, etc.) were not to come forward, then consequently, the level of development provided would inevitably be frustrated - and in significant part.

- 3.4 It is unsatisfactory that a proposal for what amounts to a very significant level of development is so precariously dependent upon doubtful and vaguely expressed infrastructure schemes, the delivery of which remains without evidence and highly questionable.
- 3.5 In addition to infrastructure, various constraining environmental designations (including the protection of Hoo Peninsula's habitats, etc.) require appropriate protection and management. Other protections are afforded to various local landscapes. No detailed consideration is given within the Draft Document to the impact on protected habitats, features and landscapes, of a strategy for delivering c.12,000 homes. It presently appears doubtful that such constraints can sustainably be met.
- 3.6 Consistently, our previous representations fundamentally questioned whether the Hoo Peninsula is, first, the most sustainable location for significant housing development and second, if it is a sustainable location in principle, whether development of such a scale is sustainable and indeed deliverable. The Draft Document regrettably does nothing to alleviate these basic concerns.
- 3.7 We note that whilst the Draft Document incorporates a list of headline opportunities that provide for a (very high level) illustration of the potential of Hoo Peninsula sites, these fail to address the severe constraints associated with the envisaged level of development of the Hoo Peninsula. These do not extend into any meaningful discussion of sustainability or deliverability. The opportunities outlined are just three generic statements which purport (poorly) to address obvious concerns with development on the Hoo Peninsula. This includes: new inward investment in the local economy associated with large scale residential development; improvements to the road network and public transport, yet no assessment of how additional movements will be managed, is given; and, an improvement in the 'general quality of life', which may be true of many locations where up to 12,000 additional homes are proposed to be built. Overall, the insignificant opportunities do not begin to outweigh the major constraints noted within these representations and which are indeed recognised by the Council.
- 3.8 In addition, an alternative concern arises even were such large-scale development even sustainable in principle (which is strongly doubted). Should development fall materially below the level projected in the Draft Document, due (say) to lack of critical mass, then it would follow that many of the improvement opportunities outlined would also fall away. Such improvements are presently suggested to include an aspirational re-opening of the train station at Hoo and revival of some stopping passenger train services, in addition to road network improvements, and bus service and cycle route enhancements.
- 3.9 This concern is substantiated by the Council's approval on 28 April 2020 for 202 units on the unallocated site at Land South of Lower Rainham Road (MC/18/1796). The Council here acknowledges that Scenario 3 and the Hoo Peninsula cannot suitably deliver the quantum of housing it claims.

4 HIF

- 4.1 The Draft Document is heavily reliant on HIF. There is clear acknowledgment that much of any development of the Hoo Peninsula will only prove possible in conjunction with HIF funded infrastructure and derivative investment. HIF was awarded in November 2019. However, the specific triggers for and any phasing etc. remains unknown.
- 4.2 To our knowledge there remains no published information detailing the content of the Council's HIF award. Three published reports to Committee provide scant information of the progression to the award:
 - Cabinet Meeting of 5 February 2019;
 - Council Meeting of 10 October 2019; and
 - Cabinet Meeting of 7 April 2020.

- 4.3 Development of the Hoo Peninsula was discussed at a Committee meeting on 10 October 2019. This report was inviting additional funding to allow for work to continue in association with the HIF bid. Whilst the decision was approved, the additional work required to be undertaken to properly formulate the bid (and ultimately to direct any award) and which had been briefly mentioned, is still yet to be published.
- 4.4 The report had stated that the work to be completed by December 2019 (if the expenditure deadline was to be met) included the publication of an Infrastructure Delivery Plan and associated viability assessment for the Hoo Peninsula. Unsatisfactorily, there remains no evidence that this work has been meaningfully progressed, still less completed, internally. No Infrastructure Delivery Plan has been published, to date.
- 4.5 The 7 April 2020 Report to Cabinet failed to detail the progression/timescales of any HIF funded projects, albeit it did suggest that all HIF money must be spent by 31 March 2024. No evidence has been published by the Council projecting any infrastructure works.
- 4.6 In the circumstances, there is serious doubt on the ability of the Council to allocate/expend all (or even the majority part) of the HIF money awarded. This is before any scrutiny is given of the triggers for HIF expenditure. This will, in turn, have obvious implications for the delivery of all infrastructure necessary to support development of the Hoo Peninsula.

5 CONSTRAINTS TO DEVELOPMENT ON THE HOO PENINSULA

Transport Capacity

- 5.1 The Draft Document unsurprisingly confirms that the development of a small rural town on the Hoo Peninsula and extended employment areas will be much dependent on strengthened connections and significant transportation upgrades. Highway improvements to the existing A228 and A289, a new road and new rail passenger services are highlighted as key infrastructure projects.
- 5.2 A break-down of funding was outlined in a report to Committee in October 2019:
- Road investment - £86.7m
 - Rail investment - £64m
 - Other essential infrastructure - £14.3m
- [Professional fees - £5m]
- 5.3 The Council has suggested that this infrastructure will unlock the delivery of 10,000 new homes. The Council's own understanding is that this includes a 'deadweight' figure of 2,000 homes for Hoo Peninsula. 'Deadweight' has been approached by the Council as to mean the number of dwellings said to be capable of delivery when accounting for current infrastructure, without the requirement for HIF money. No evidence has been provided regarding how the deadlock figure has been reached, especially considering existing constraints acknowledged by the Council.

Road Network

- 5.4 Identified, required, road improvements total circa £86.7 million. These include:
- improvements to A289 for:
 - Anthony's Way Roundabout, and
 - Sans Pareil Roundabout;
 - Four Elms Hill;
 - local road improvements Bells Land and Ropers Lane roundabout;
 - new bypass from A228 Main Road roundabout to:

- A289 west of Four Elms, and
- A228 at Chattenden Road;
- new signalised junction to replace roundabout at Main Road and Hoo Peninsula;
- New signalised access road off Ratcliffe Highway for new train station at Sharnal Street.

- 5.5 The Draft Document confirms that HIF money will be necessary to bring about a reduction of traffic queuing on Four Elms Hill, an acknowledged area highlighted in the Draft Document to be a major constraint. No specification is given for these improvements, and so their acceptability cannot properly be assessed.
- 5.6 For the Council to even have the chance of meeting the HIF timescale (i.e. expenditure by 31 March 2024), this road scheme, as with others, would need to reach (developed design) 'RIBA stage 3' and include coordinated and updated proposals, realistically, as part of a December 2020 submission. There is no basis for thinking this to be achievable.
- 5.7 More generally, there is a continued absence of any detailed proposals in respect of required road investments, which the Council itself acknowledges.
- 5.8 If the Council has indeed completed design work as part of progressing the above road or other improvements, then this warrants publication, further consultation and review.

Rail

- 5.9 Proposed rail improvements, totalling £64 million, may include:
- Creation of new (direct) service from London Victoria to Hoo Peninsula:
 - Up to one train per hour frequency (said to be deliverable with existing infrastructure);
 - reopened station at Sharnal Street:
 - new modular station and platform;
 - passenger drop-off area;
 - new signalised access off Ratcliffe Highway;
 - new access road to the station;
 - public space;
 - car parking;
 - Link on Medway Cord line to Higham:
 - allowing freight to connect to Paddock Wood, without travel via London;
 - new services from Hoo to Medway via Higham and Strood;
 - Up to two trains per hour frequency.
- 5.10 No information has been forthcoming regarding possible rail improvements within the Draft Document. None is available online.
- 5.11 The accent within the Draft Document on rail infrastructure coming forward rather emphasises the importance of detailed infrastructure delivery plans to fully set out such proposed improvements, as well as the timescales and basis for their sustainable delivery.
- 5.12 In their absence it is obviously impossible to appreciate how these will enable or impact upon the deliverability more generally of housing on the Hoo Peninsula. The complete absence of this information is

the more disappointing given the Council's present direction of travel for the Hoo Peninsula to be a significant focus of the eventual submission local plan.

- 5.13 More particularly, in that the Council outlines its vision that the reopening of a train station may be achievable and an extended service provided, it is highly questionable that there exists the wider integrating infrastructure across the rail network to sustain this. Discussions with Network Rail appear to be at a very early stage. We anticipate that Network Rail will require a robust business case to justify the provision of a new rail service, subject to integration within the network.
- 5.14 Further, without the delivery of a new train station, it is questionable whether the significant level of development for Hoo Peninsula would prove sustainable and deliverable.
- 5.15 Even if sustainable in principle, delivery of rail infrastructure would inevitably take considerable time. Even were the Council now in a position to forecast the delivery of this infrastructure (which, evidently it clearly is not), its reliability would be questionable given the Council's track record.
- 5.16 It is by no means characteristic of a HIF award authority to withhold or fail to work up a properly developed infrastructure proposal. For example, the proposal by Essex County Council for Beaulieu Station and North Eastern Bypass is, openly, to provide a new railway station alongside highways improvements (including a bypass similar to that proposed by Medway Council). By an update published 19 February 2020, ECC had announced the following 'opening' dates:
 - North Eastern Bypass - 2024;
 - Beaulieu Station - 2025/16.
- 5.17 A request for a Scoping Opinion (ref. CC/CHL/14/20/SPO on Essex CC's planning database) was also validated 21 February 2020 for: *Chelmsford North East Bypass (CNEB): A single carriageway road between Roundabout 4 of the Beaulieu Park Radial Distributor Road (RDR1) and a new roundabout on the A131 at Chatham Green plus dualling of the existing A131 between Chatham Green and Deres Bridge roundabout.*
- 5.18 We add that albeit Medway Council's HIF bid was c.£50 million less than that of ECC, it has seemingly been made in respect of broadly the same level of infrastructure works.
- 5.19 In clear contrast with ECC, the Council is regrettably yet to publish any detailed information for future HIF expenditure and intended HIF works.
- 5.20 Indeed, were ECC's infrastructure delivery trajectory to be adopted as any comparable guide, it appears highly unlikely that Medway will complete HIF infrastructure works before 2025.

Pedestrian & Cycle Provision

- 5.21 The Draft Document also rightly highlights various significant barriers to development of the Hoo Peninsula. But one notable constraint is the existing pedestrian network which is notably fractured throughout the Peninsula. Other parts of this network are unsafe (e.g. travelling north east along Stoke Road, and access between Peninsula Way and Stoke Road (north - south). Additionally, as also noted by the consultation document, Peninsula Way acts as a barrier for movement with limited safe crossings. Evidently, with proposed development to the north and south of Peninsula way, safe crossings are vital to allow for sustainable travel. However, the document provides limit information on how this will be provided, instead it loosely locates two areas on the peninsula where this might be possible.
- 5.22 The pedestrian network will certainly require very significant improvement, inevitably requiring significant investment - which it is presently uncertain to come forward.
- 5.23 There is additionally the road network, other than intended HIF road improvements. Ropers Lane has seen investment to improve the pedestrian and cycle routes yet many other roads have not (including between the new proposed train station, and proposed or existing settlements at Hoo and High Halstow along Christmas Lane and Ratcliffe Highway). It has not been demonstrated that any funding will be available

through HIF in order to carry out what amount to essential strategic infrastructure works in support of such development of the Hoo Peninsula.

Sustainability

- 5.24 The Hoo Peninsula is notably poorly connected to surrounding large towns such as Gillingham, Chatham and Strood. The Four Elms roundabout which serves as a gateway in and out of the Peninsula already suffers severe congestion. In the absence of any detailed evidence regarding improvement to the Four Elms roundabout, it is unknown whether this gateway can begin to sustain very sizeable development of up to 12,000 homes.
- 5.25 The Hoo Peninsula is also poorly connected by public transport. The bus service providing direct access to Rochester and Chatham is limited and journey times are often delayed due to congestion on Four Elms Hill and across the River Medway. There is also no rail service which provides high speed travel.

Air Quality & Climate Change

- 5.26 The gateway into Hoo Peninsula is the Four Elms Roundabout. There is a traffic bottleneck between the Four Elms roundabout and the roundabout at the junction of Peninsula Way and Main road. This stretch is included within an Air Quality Management Area. It is unknown how the Council intends to successfully develop an action plan for air quality improvement within this area, compatibly with the development of up to 12,000 homes on the Hoo Peninsula.
- 5.27 The only information showing any integrated consideration of air quality and development on Hoo Peninsula is briefly set out in the Council's 2019 air quality monitoring report. This rather unconvincingly suggests that the intended development of the Hoo Peninsula is likely to bring about air quality action planning benefits, including:
- increasing bus use, albeit this is dependent on traffic flow improvements, enabling shorter journey times and increased punctuality in services. Whilst an improved bus network may well be introduced when development come forwards, service take-up is a complete unknown and most likely to be marginal when compared with the considerable level of private car use. Private car use is not addressed;
 - promoting walking and cycling, through new walking and cycling routes via a Strategic Environmental Management Scheme. However, only a small proportion of pedestrians will be located within a reasonable walking distance of the proposed train station, which will likely give rise to only an immaterial reduction in private car use for those travelling through the AQMA; and
 - Hoo peninsula masterplaning.

SSSI & Landscape

- 5.28 Chattenden Woods and Lodge Hill are Sites of Special Scientific Interest (SSSI), including an area of ancient woodland and rare grassland, are of national importance. Any development inappropriately affecting the habitats and features of either of these sites and their ineffective management, will be contrary to national policy and no less important environmental policies of the development plan.
- 5.29 The Draft Document plainly proposes a very significant level of housing development in close proximity to (and directly abutting) the boundary of the Chattenden Woods and Lodge Hill SSSI. It is however unclear what justification the Council may provide for the arising impacts on the SSSI and whether an appropriate level of SSSI management could be achievable alongside development on this scale.

Green Infrastructure

- 5.30 The Draft Document outlines that a comprehensive green infrastructure network consisting of both natural green assets and public open spaces will enable travel to key destinations for pedestrians and cyclists. These areas are however currently shown merely as green buffers on a plan. No evidence has been provided of how much of these networks will be need to enable sustainable movement.
- 5.31 The green corridors and landscape buffers located between Hoo St Werburgh, Port Werburgh and Chattenden appear to be minimal. It is unclear how these will provide the necessary buffers required to adequately protect the characteristic open landscape of Hoo Peninsula.
- 5.32 Overall, it is far from clear how the constraints acknowledged by the Council will be adequately protected and with appropriate mitigation, where required. The very limited scope of the Draft Document fails obviously to detail and provide comfort that proposed development of the scale of anything approaching 12,000 homes can prove sustainable and deliverable. The strong appearance is that such significant focus within Hoo Peninsula will prove unsustainable and undeliverable.
- 5.33 We again urge the Council to develop alternative strategies for housing delivery.

6 HOUSING DELIVERY

- 6.1 The 2019 Housing Delivery Test (HDT) results were published in February 2020. The result in Medway is 46% (4,328 required; 1,978 delivered; 2,350 shortfall).
- 6.2 While the overall number of units delivered has increased since 2018, the overall result has worsened. Had the Council seen the delivery of just 53 fewer units over the previous three years, the result would have fallen to below 45%.
- 6.3 Next year (and for all those following) the presumption will be triggered by any delivery below 75% of housing required. The Council would have to see the delivery of c.2,200 units in the next year. This will almost inevitably prove unachievable.
- 6.4 The housing supply shortfall is expected to exacerbate extensively over subsequent years. Should the Council plan for such a large concentration of housing delivery in Hoo Peninsula, in respect which the delivery rate is expected to be slow, this will only undermine the Council's housing supply over the immediate and medium terms.
- 6.5 Since 2002, the Council's rate of delivery has averaged at 699dpa. Since the expiration of the Kent Structure Plan in 2011, this has reduced to 605dpa. When viewed against the standard method requirement of 1,693, this highlights an annual and increasing shortfall of an average of 1,000 units.
- 6.6 There is strong evidence that the Council has consistently over-estimated its housing supply. It has been unable to deliver more than c.3,400 units per five-year period, since at least 2009.

2019 SLAA

- 6.7 The 2019 SLAA suggests that all sites have been reassessed. However, within the Appendix 3 schedule, very little detail is given of this reassessment. Several sites are also now included which were acknowledged to be unsuitable by the preceding SLAA (June 2018).
- 6.8 The SLAA now includes 22 new sites located within the Hoo Peninsula, in respect of which it is suggested that HIF money will provide for appropriate mitigation. The SLAA inadequately suggests for all of these that "*Transport and environmental impacts to be mitigated by Housing Infrastructure Fund*". Of these sites, it is suggested that a total of 1,324 units will come forward over the next 5 years. In light however of the questionable support which HIF money will offer within this same timescale, the significant level of infrastructure which will be required, and the absence of detail over infrastructure delivery, this is a wholly unrealistic 'vision'.
- 6.9 Additionally, albeit there are 17 new sites which have now been considered suitable outside of Hoo Peninsula, the reason for promoting these sites is not set out, even in outline, for many sites. No update is

given in respect of 10 sites. 2 sites maintain previous text outlining that the site is “*unachievable and unavailable*”. There is presently no evidence as to the suitability and availability of these sites. Absent this, these sites may only properly be considered to be undeliverable. The contribution of these sites to overall supply (totalling 895) should be removed.

7 CONCLUSION

- 7.1 In summary, it is almost inconceivable that the Council will be able to progress the Local Plan in the timescale previously outlined. Aside from programme issues, a Plan which is proposing to concentrate housing development on the Hoo Peninsula represents a fundamentally flawed approach. Development on the Hoo Peninsula is dependent on very significant infrastructure delivery and upgrading, which is primarily proposed to be funded by HIF. There is serious doubt on the ability of the Council to use the HIF money awarded, in the timescale outlined. If any one of the significant infrastructure projects were not to come forward, then the level of development would also be impacted.
- 7.2 Albeit the Draft Document includes headline opportunities, these fail to address the severe constraints associated with the level of development envisaged on the Hoo Peninsula. But one major constraint is the need for necessary infrastructure. There is a continued absence of any detailed proposals in respect of potential road and rail investment. From the bare information available timescales are already slipping in relation to the delivery of such projects.
- 7.3 The Hoo Peninsula is poorly connected by public transport. The Draft Document offers notably limited information on how this will be improved. Indeed, Four Elms Hill suffers severe congestion, and the local bus network will be severely impacted. Four Elms Hill is the subject of severe air quality concerns, with this stretch of road having been included in an AQMA. It is unknown how the Council intends to successfully develop an air quality action plan for improving air quality whilst proposing up to 12,000 homes on the Hoo Peninsula which will inevitably increase traffic movements through the AQMA.
- 7.4 Equally, as noted in the Draft Document, the pedestrian network will require significant improvement. However, no detailed information is provided. From a review of the projected HIF spend, it is uncertain how these improvements may come forward. Additionally, the development of 12,000 homes will prove transformational in landscape terms and have a severe impact on the adjacent SSSI and other protected landscapes. The green corridors and landscape buffers located between Hoo St Werburgh, Port Werburgh and Chattenden appear to be minimal. It is unclear how these will provide the necessary buffers required to adequately protect the SSSI and characteristic open landscape of Hoo Peninsula.
- 7.5 Notwithstanding the flawed approach to development on the Hoo Peninsula, the Council has continually under-delivered on their housing requirement, with an annual shortfall of 1,000 units. This emphasises the need for well-considered, plan-led delivery housing, especially during the early part of the plan period and in evidently sustainable locations.
- 7.6 Overall, the level of development envisaged on the Hoo Peninsula is unsustainable and highly unlikely to prove deliverable. Even if sustainable, projected timescales offered by the Council are wholly unrealistic.

Comments on “Planning for Growth on the Hoo Peninsula Consultation”

The Hoo Peninsula is a mixture of intensively farmed land, villages, some historic, and areas of open space, marsh and woodland of great wildlife value. Much of the north eastern part is remote saltmarsh. The southern part is bordered by the River Medway, some of it quite inaccessible. There are also large industrial areas such as the Isle of Grain power station and the now defunct Kingsnorth power station.

The farmed area may be efficient but due to the removal of hedgerows in past decades and its flat windswept location is quite bleak. Sensitive development could not just complement but improve the rural landscape.

Overall we think this would be a good option for a modest size housing development, given its proximity to the Medway Towns, existing villages at Hoo and Chattenden, and rail line connecting to Gravesend and London.

However, we suggest several caveats:

Any development should avoid sprawl, and be compact.

Its extent should be strictly limited to avoid damaging the rural and agricultural character of the area.

It should incorporate buffer zones, as proposed, to prevent it becoming an extension of the Medway Towns.

New road building should be kept to a minimum.

Existing areas of wildlife value including SSSIs such as Chattenden Woods and Cockham Wood should be strictly protected and not impinged on, preferably with buffer zones.

Houses and flats should be a model for the future. They should be carbon neutral and have water collection systems as the south east is a water stressed region. Currently nearly all new build in Kent lacks solar panels, a costly missed opportunity.

Houses as well as public buildings should allow access for Swifts in their design, which can be done at very low cost (through specially designed bricks), also bats, so that these threatened species can breed and hibernate.

Home working or working at nearby centres such as Kingsnorth should be encouraged by the layout and design.

Travel by rail, cycle and foot should be made as convenient and easy as possible. Past mistakes (such as no pedestrian or cycle access in the Medway Tunnel) should be avoided.

The new rail station proposed at Sharnal Street sounds attractive, given the line is already built and hardly used, but will there be sufficient numbers of passengers? Residential development should be concentrated around it to guarantee that. A link line to Strood is proposed but would this be cost effective to build and run?

Planting of large numbers of native trees and new hedgerows will be crucial. The hedgerows should be designed to link existing ones and local woods as wildlife corridors. Both these features should be planned and started well before any construction.

Existing streams and culverts should be opened up and preserved as features, and ponds created where appropriate.

What concerns us all now in terms of environmental considerations, and new ways of working and living in the light of the current pandemic, will surely be so much greater when a building proposal of this size is realised in twenty years time.

This could be a pioneering development which in due course would become a most attractive place to live and work.

Dr Peter and Mrs Margherita Williams

11.5.2020

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:

Josephine Brown

Name of organisation (if applicable):

Address:

Email:

Phone:

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?

Comments:

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

Ref:

7. Please use the space below to make any other comments on the consultation document:
8. The Green Belt review must be Option 2 as this will provide the vital and only green corridor
9. West of Town Road, Cliffe Woods from Chattenden Woods to Cliffe Marshes, both SSSI and Ramsay sites.

It is extremely difficult if not impossible to complete this form as answers cannot be entered for

Part 2 question

This lockdown period has emphasised the need for maintaining our rural areas in Medway.

The peace and quiet and the clean air due to lack of traffic should show everyone that the Hoo Peninsula should be maintained as a rural area.

The continuation of non essential construction in Cliffe Woods in spite of government instruction has been noisy and polluting from which there was no escape as we have been in lockdown.

The ignoring of safety measures has been dangerous and selfish.

BIRMINGHAM
BRISTOL
CAMBRIDGE
CARDIFF
EBBSFLEET
EDINBURGH
GLASGOW
LEEDS
LONDON
MANCHESTER
NEWCASTLE
READING
SOUTHAMPTON

**BARTON
WILLMORE**

bartonwillmore.co.uk
The Observatory
Castle Hill Drive
Castle Hill
Ebbsfleet Valley
Kent
DA10 1EE

Catherine Smith
Planning Policy
Medway Council
Gun Wharf
Dock Road
Chatham
Kent
ME4 4TR

E-MAIL ONLY

11 May 2020

Dear Ms Smith

**REPRESENTATIONS IN RESPONSE TO THE CONSULTATION ON
PLANNING FOR GROWTH ON THE HOO PENINSULA**

I am writing to you on behalf of Uniper in response to the "Planning for Growth on the Hoo Peninsula" consultation and we welcome the opportunity to comment on the document.

We understand that the outcome of this consultation will inform the preparation of a "Development Framework" which will provide further detailed guidance on the expansion of Hoo. The representations are made in the context of Uniper's land interests at Kingsnorth and the Site of the former Coal Fired Power Station, also known as MedwayOne. As Officers will be aware, the Site has been identified as suitable for a range of employment generating uses (B1c/B2/B8), in the Council's most recently published "Strategic Land Availability Assessment" (SLAA). Site ref 647.

The Site is circa 232ha, substantially previously developed and is one of, if not, the largest strategic employment site in Medway. For ease of reference, we enclose a Site Parcel Plan (Dwg RG-M-03 Rev A). Due to the scale of the Site, it is split into parcels. This is for administrative purposes only to aid the description of different parts of the Site.

As set out in the representations below, whilst in general we support the thrust of the consultation document and the expansion of Hoo, it currently fails to appropriately recognise the need to deliver strategic employment opportunities to support the sustainable expansion of the settlement and the significant opportunity MedwayOne presents, in meeting this requirement. Our representations therefore seek that the delivery of employment opportunities is identified as a key principle and the redevelopment of MedwayOne is identified as integral to achieving this.



FS 29637

Registered in England
Number: OC342692

Barton Willmore LLP
Registered Office:
The Blade
Abbey Square
Reading
RG1 3BE
F/ +44 (0)118 943 0001

i) Policy Background

MedwayOne (Parcels 2, 4 & 5) is allocated in the Adopted Local Plan 2003 for a range of employment/industrial uses covering Use Classes B1, B2 and B8. The Council's emerging Local Plan, Regulation 18 (March 2018) identifies the Kingsnorth area as a location better focussed for more land intensive light and heavy industrial activities and distribution, alongside the London Medway Estate (to the north of the Site). It specifically supports the expansion and/or extension of existing employment within the area.

The continued identification of the Site for employment is therefore entirely in keeping with the existing and emerging policy framework.

ii) A New Vision for Hoo St Werburgh

In general, we support the expansion of Hoo as an area of focus for development in Medway. It is well positioned to benefit from access to a range of modes of transport, strategic links to the highway network and Lower Thames Crossing. The identified HIF money and associated infrastructure it delivers will also serve to enhance the accessibility/sustainability credentials of the area. Hoo, is also well positioned close to MedwayOne, which provides a strategic employment opportunity to support the sustainable expansion of the settlement.

The Council's "Vision for Hoo St Werburgh" acknowledges that the residential expansion of Hoo will bring with it opportunities for "improved services and facilities". The identified four key principles further reference the creation of "sustainable neighbourhoods". The Council's "Vision and Aspirations" goes onto acknowledge the potential of the new passenger rail station for unlocking new business and employment opportunities.

Whilst in general terms these statements are supported, they fail to substantially address the need to deliver strategic employment opportunities to support the sustainable expansion of Hoo and the significant benefits of redeveloping existing employment sites, such as MedwayOne, that can contribute to the identified aims and aspirations. In particular, the redevelopment of existing sites will assist in the aim of "encouraging more sustainable growth that respects the limits of our natural resources...." through reducing reliance on greenfield release.

Given the scale of the opportunity at MedwayOne and the need to deliver strategic employment opportunities to support the sustainable expansion of Hoo, **the redevelopment of existing employment sites must be identified as an "Aspiration" if not a "Key Principle"**.

iii) Masterplan

We understand at this stage that the masterplan remains illustrative and appears to focus on new development areas. The plan on pg3, currently separately labels MedwayOne as "Kingsnorth Power Station" with an "Employment Area" identified to the north of the Site. The labelling of the masterplan in this regard then differs across the plans on pgs 9, 19 and 20. The role of the Site within the masterplan is therefore somewhat ambiguous, although it is acknowledged to be included with the Employment Hub Character Area, as addressed below.

Notwithstanding, across all plans, MedwayOne should be included within the employment area and Parcels 1 and 4 (see attached Site plan) further identified for development. Parcel 1 provides the access into the

main site and immediately adjoins the adjacent Kingsnorth Industrial Estate to the east, which it has a natural synergy with. Moreover, it comprises previously developed land (PDL).

Parcel 4, should also be identified for development. Whilst not PDL per se, it forms an integral part of the wider MedwayOne development area, providing alternative development options which will help “pump prime” the redevelopment of the PDL parts of the Site to support the Site’s comprehensive redevelopment.

Parcel 4 relates well to the existing Kingsnorth Industrial Estate and Damn Head Creek Gas Fired Power Station on the northern boundary. The principle of developing this part of the Site for employment uses has also been long established in the Adopted Local Plan 2003.

In addition, parts of Parcel 6 have development potential. Owing to environmental constraints, it is acknowledged the development potential is less than other parts of the Site. However, it could support sustainable energy sources, such as solar, supporting the wider sustainability and climate change aspirations for the “Vision” for Hoo.

The masterplan should therefore be amended to include Parcels 1, 4 and 6 and MedwayOne included across all plans within the employment area.

iv) Opportunities & Constraints

The opportunities plan fails to acknowledge the redevelopment of MedwayOne as an opportunity. As already outlined, as a strategic PDL employment site, its redevelopment represents a significant opportunity in the area not only in terms of employment generation but also reducing the need for further greenfield release. **The Site must therefore be identified as an opportunity for development as part of the identified “major employment zone”.**

v) Neighbourhood Character Areas: Thriving Employment Hub in Kingsnorth

We welcome the inclusion of MedwayOne as part of the Kingsnorth Employment Hub. However, it is noted that this character area is not included on the “Distinct Neighbourhoods and Villages” character area plan on pg11 or on the “Framework Masterplan Plan” on pg20. **The “Employment Hub” character area needs to be included on these plans for transparency and to further illustrate how strategic employment provision is central to the sustainable expansion of Hoo.**

As with the comments above in respect of the masterplan, the plan on pg 19 must be amended to include development Parcels 1, 4 and 6.

With regards to the supporting text, we support the listed benefits of this location for employment. However, the information provides no detail on the types of employment uses supported in this location or any key design considerations that would contribute to making this area distinct, other than it not comprising residential uses.

In line with previous representations and as acknowledged in the SHLAA, the Site is best suited to provide B1c/B2 and B8 uses. It is also well suited to energy uses, because of the existing (and to be retained) National Grid Substation on the Site that provides a direct connection into the National energy network. The Site is also well placed to provide energy uses serving the expansion of Hoo, which will inevitably increase demand on local energy infrastructure. **As such any policy framework should look to support a range of employment/industrial and energy uses across the Site to support the Site’s redevelopment and sustainability of Hoo.**



FS 29637

Registered in England
Number: 0C342692

Barton Willmore LLP
Registered Office:
The Blade
Abbey Square
Reading
RG1 3BE
F/ +44 (0)118 943 0001

vi) Feedback Summary

In summary, to support the sustainable expansion of Hoo and to realise the considerable opportunity that MedwayOne presents as a strategic employment site, the Development Framework document going forward must:

1. Identify the redevelopment of existing employment sites as an "Aspiration" if not a "Key Principle".
2. Identify MedwayOne as an opportunity for development as part of the identified "major employment zone".
3. The masterplan amended to include Parcels 1, 4 and 6.
4. Include MedwayOne (as modified above) as part of the "Employment Hub" which needs to be included on all character area plans.
5. Provide a policy framework that supports a range of employment/industrial and energy uses across the Site to support its redevelopment and sustainability of Hoo.

We trust that the above comments will be taken into consideration in the evolution of the Hoo Development Framework. However, if you have any questions regarding the above or wish to discuss the development potential of the Site further, then please do not hesitate to contact me.

Kind Regards

LUCY WILFORD
Associate

cc Lucy Berry Uniper
enc As listed



FS 29637

Registered in England
Number: 0C342692

Barton Willmore LLP
Registered Office:
The Blade
Abbey Square
Reading
RG1 3BE
F/ +44 (0)118 943 0001



The scaling of this drawing cannot be assured

Revision	Date	Drm	Ckd
A	27.11.18	ALC	NT

Removed DRAFT.

Parcel Number	Ha	Ac
1	13.84	34.21
2	21.01	51.92
3	13.37	33.03
4	24.14	59.65
5	57.10	141.10
6	64.57	159.56
7	37.97	93.83
TOTAL	232.01	573.31

Project
**KINGSNORTH,
ST WERBURGH**

Drawing Title
PARCEL PLAN

Date
19.11.18

Project No
29497

Scale
NTS @ A1

Drawing No
RG-M-03

Drawn by
ALC

Check by
NT

Revision
A

0 10 20 30 40 50 60 70 80 90 100

**BARTON
WILLMORE**

Planning • Master Planning & Urban Design • Architecture •
Landscape Planning & Design • Environmental Planning • Graphic
Communication • Public Engagement • Development Economics

bartonwillmore.co.uk

Offices at Birmingham Bristol Cambridge Cardiff Ebbw Vale Edinburgh
Glasgow Leeds London Manchester Newcastle Reading Southampton