



Regeneration Delivery  
Physical and Cultural Regeneration  
Regeneration Culture Environment and  
Transformation  
Medway Council  
Gun Wharf  
Dock Road  
Chatham  
ME4 4TR

## **BY EMAIL ONLY**

## **Environment, Planning and Enforcement**

Invicta House  
County Hall  
Maidstone  
Kent  
ME14 1XX

Phone: 03000 415673  
Ask for: Francesca Potter  
Email: Francesca.Potter@kent.gov.uk

8<sup>th</sup> April 2021

Dear Sir/Madam,

### **Re: Hoo - New Routes to Good Growth**

Thank you for providing Kent County Council (KCC) with the opportunity to comment on the “Hoo – New Routes to Good Growth” consultation.

The County Council has reviewed the consultation document and would like to raise the following comments for consideration.

### **Highways and Transportation**

The County Council, as Local Highway Authority for Kent, would welcome further engagement on the wider impacts on the highway network resulting from development at Hoo.

#### Chapter 3 – Our Proposals: Highways

The M2 Junction 1 (A289) may have a restrictive effect on traffic travelling between the Hoo Peninsula and the west, all of which (apart from that associated with Gravesend, which uses the A226) is accommodated at this junction.

The proposed highway improvements presented in Section 3 of the consultation document would provide localised congestion relief in the area of the proposed development but would not involve any changes to M2 J1 (A289).

Upon implementation of the Lower Thames Crossing (LTC) - which is anticipated to open five years after the proposed highway improvements are completed - junction M2 J1 is forecast to experience increased traffic volumes.

KCC anticipates that this junction will operate around capacity at peak times once the LTC becomes operational, based on modelling carried out by Highways England, which would not have included the full scale of proposed development on the Hoo

Peninsula. The LTC model can only consider “committed development” and the closing date for recording this was set at June 2020.

KCC is currently liaising with Medway officers and Highways England to discuss additional modelling of “Other Alternative Scenarios” to identify impacts of the LTC on proposed development on the Hoo Peninsula. It is currently unclear how the improvements proposed to the A228 and A289 will be impacted by an increase in traffic from the LTC, not only once operational, but also during the construction period, where the A289 is anticipated to be an official diversion route for LTC construction vehicles.

The funding for this project dictates all works need to be in place and completed by Spring 2024, with construction proposed to commence in Summer 2022. Where possible, all construction movements should be made by rail to minimise the distribution on the highway network and reduce the cumulative impacts of construction of other large scale infrastructure schemes in the area taking place at the same time, such as the potential London Resort and the LTC.

*Page 11*

Reference is made to “*proposals involve improvements to existing infrastructure, as well as the provision of new infrastructure including slip roads, junctions and interchanged on the A228 and A229*”. Clarification is needed as to whether the inclusion of the A229 is a typographical error, or if not, what the nature of these improvements on the A229 involve, as no detail is provided within the consultation material.

#### Chapter 4 - Our Proposals: Rail

*Page 32-45*

The presumption that the converted freight route will be electrified (to as far as the proposed new terminus at Hoo) should not be made at this stage. Whilst 3rd rail extension electrification based on the existing network 750v DC system is clearly preferable, there is currently opposition within the regulatory arm of the rail industry to any further extension of the 3rd rail network, unless there is a high level of protection provided. At present, the Office of Rail and Road (ORR) and the Rail Safety Standards Board (RSSB) are continuing assessments of requests for similar extensions on the 3rd rail network (e.g. Hurst Green to Uckfield), so there may be a template from another route which could be adopted for the Hoo line. In the meantime, the scheme sponsors should keep other traction options open, such as bi-mode electric/battery rolling-stock in case the preferred option of electrification is not permitted.

The proposal for dualling of the existing single line sections between Hoo Junction and Cliff Junction, and the section through Cooling Street, looks feasible, and would provide the operational flexibility required for the proposed 2 trains per hour (tph) passenger service plus existing freight paths. The proposed 2tph service would also combine efficiently with the existing 2tph semi-fast service between London Charing Cross and Gravesend.

*Page 33*

The proposed location of the new terminus station at Hoo to the south-east of the original station at Sharnal Street is a good location. There would be no need to provide a second platform and footbridge with lifts at the start of the service, as a single track serving one platform adjacent to the station building would provide level access for all. It would only be if the new passenger service were to be extended eastwards towards Grain that a second platform and footbridge with lifts would be required.

Based on the London Transport Local Road & Rail Timetable for the Dartford Area dated 3 February 1960, Table 4, the journey time between Gravesend Central and Sharnal Street was 22 minutes, although this journey at that time included stops at Denton, Uralite, Cliffe and High Halstow. Without these stops, and with a further extension to the new station at Hoo, it is reasonable to estimate the new Gravesend – Hoo journey time at approximately 20 minutes.

*Page 35*

It is correct to describe the new service as providing a direct link to London (Charing Cross), with some services to Cannon Street in the peaks. This would be delivered by extending the existing Metro services which start/terminate at Gravesend eastwards to start/terminate at Hoo, so preserving the pathing from Gravesend westwards to and from the London termini. It is also correct to describe the interchange facility, which would be created at Gravesend for passengers wishing to transfer to services to the Medway Towns, although in practice it is more likely that such journeys would be taken by bus, as this would be a more direct route from the Hoo Peninsula.

*Page 36*

The County Council agrees with the described likely impacts on the existing freight services on the route. These would need to be managed with Network Rail and the freight operators, to ensure the retention of existing freight paths (modified as required).

*Page 37*

Level Crossings: The County Council notes that every crossing on the new passenger section of route is listed as requiring modification, either by enhanced crossing facilities or by diversion of pedestrian routes across the railway. Experience from other projects indicate that for the costs of any works associated with level crossings – even foot crossings – it must be ensured that sufficient headroom of funding and project time is available to ensure that level crossing modifications do not delay the scheme from delivery as planned.

*Page 45*

With reference to the dualling of sections of route and electrification, the County Council refers to its comments above, in relation to Page 32.

The County Council agrees that construction loads should be delivered by rail to the sites, minimising or removing altogether heavy goods movements by road.

## **Public Rights of Way (PROW) and Access Service**

### *Page 37 – Level Crossings*

The County Council notes the level crossing proposals within the consultation document and would urge consideration of the enjoyment of a PROW when proposing diversions. Some PROW in this area may be at risk of flooding and KCC would recommend consideration of mitigation measures, such as aggregate surfaces where appropriate.

## **Heritage Conservation**

The County Council recommends that the consultation document go further to highlight significance of the historic environment of Hoo, with the inclusion of details for what measures will be taken to conserve or enhance the heritage affected.

KCC notes that in addition to known historic designations, there is the possibility of discovering further archaeological remains of great significance within Hoo. The road and rail improvements will impact significantly on a range of designated and non-designated heritage assets, and on a fragile historic landscape. It is essential that the needs of these assets are integrated into the proposals from the very beginning of the process so that the assets themselves are not adversely affected, and so that the heritage landscape that they comprise does not become fragmented.

The County Council recommends that the historic environment is considered alongside other environment aspects to ensure the maximisation of potential benefits arising from the proposed development.

The document identifies a range of possible environmental actions that are focusing on access improvements and localised biodiversity and natural environment improvements. KCC recommends that this is expanded to include interpretation and signage improvements to help people learn about and enjoy their heritage, as well as educational infrastructure such as community heritage or archive facilities. Many of the proposals in the document, and in the growth that is to come in Hoo, will impact archaeological remains. These remains constitute a key component in the historic environment of Medway being tangible survivals of Medway's heritage. The National Planning Policy Framework (NPPF) (paragraph 199) fully recognises the importance of this resource.

After archaeological work is completed, an archaeological 'archive' will be created – a sample of the most significant finds and records from the excavation. This archive

is what allows the research and community exploitation of the archaeological work. It allows researchers to investigate aspects of the excavation even many years after the event. It allows schools and community groups to investigate their local heritage and see the materials that were discovered, even, perhaps, underneath their own homes. The archives are a key method by which the now-lost heritage is connected to the modern community. In most counties in England these archives are deposited in local museums. In Kent, however, most museums are now full, and the archives are left in what are often insecure and inappropriate stores at the archaeological contractors.

The need for archaeological storage for these materials, with proper education and access facilities, is critical to allow a full appreciation of the heritage of Medway. This need is created almost entirely by commercial development and represents a significant infrastructure requirement; and for which there are no additional resources. Some of the ongoing costs of the service could be met by charging the developer on a site-by-site basis. This will not provide for the initial setup cost, however, nor the facilities for community use, and it is these elements that are appropriate for inclusion as part of development contributions. KCC would urge that Medway Council considers the provision of archiving facilities as an appropriate use of HIF environmental mitigation funds.

## Chapter 2 - Process and timelines

The text states that *“strategic environmental management measures would be needed to help avoid impacts to the sensitive ecological sites on the peninsula”*. The County Council recommends that the need for strategic environmental management measures expanded to the heritage of the area – which is also significant and vulnerable and will require environmental management measures.

KCC would also encourage Medway Council to continue to support the ‘Whose Hoo’ National Heritage Lottery Fund (NHLF) project application that is in development. A successful project could play a key role in helping to integrate the proposed development and its associated infrastructure into the existing landscape and in engaging the local community. Irrespective of whether the NHLF application is successful or not, KCC would encourage Medway Council to continue to support the goals of the project and, as far as possible, try to assist partners in delivery.

### *Proposed road improvements.*

County Council commentary on each of the phases of the highway improvement works is detailed in Appendix 1.

## Page 29 - *Ecological and environmental constraints*

KCC recommends that the constraints listed should also include those related to the historic environment as all the Phase areas contain significant archaeological monuments and have potential for the discovery of as yet unknown sites.

*Page 30 - Environmental and ecological mitigation*

The County Council would recommend reference to the historic environment in this section and the need for a comprehensive historic environment study to inform the proposals, drawing on the Historic England Hoo Peninsula Survey reports.

Chapter 4 - Proposed railway works

*Page 33 - Sharnal Street Station*

The County Council refers to its comments on Phase 4 set out in Appendix 1.

*Page 37–44 Level crossings*

County Council commentary on the level crossing proposals is detailed in Appendix 2.

*Page 46 Hoo Junction to Cliffe Junction track dualling*

There have been extensive archaeological discoveries at Hoo Junction including Bronze Age hoards, a Romano-British cremation cemetery and pottery kilns, and Anglo-Saxon burials. The County Council refers to comments above regarding the Church Street Crossing. At Cliffe Junction, the railway passes through/close to an Anglo-Saxon cemetery and Roman finds near Buckland Farm and through the Second World War GHQ Stopline.

*Page 47 - Cooling Street passing loop*

The passing loop passes through an extensive area of crop-marks south of the railway line, possibly relating to a substantial Iron Age settlement. Chance finds of Romano-British coins and Anglo-Saxon metalwork have also been made in the area. There is also a historic farmstead at Cooling Court Farm (including a Grade II listed farmhouse and barn).

It is understood that the majority of the new track works will be “on-line”, but that some “off-line” works, including site works compounds may be required.

Strategic Environmental Management Scheme (SEMS) Proposals

The SEMS proposals should integrate a wider range of environmental variables to deliver environmental improvements – including the historic environment. There is potential to combine different aspects of the environment to create a network of green spaces in which all can flourish.

Many of the heritage sites that will be affected by the proposals were sited in part to be complementary to one another, especially the 19<sup>th</sup> and 20<sup>th</sup> century military sites, and could be enhanced by joined up green infrastructure. Others are sited on rises

and crestlines, for example, where the ability to see and be seen across the landscape was important.

In addition, improvements intended to support biodiversity (such as the excavation of ponds or water-management features) should be reviewed to ensure they do not have any negative impacts on heritage assets. Where such impacts are identified, they can be assessed and mitigated through the SEMs.

KCC recommends that all aspects of the environment participate in the SEMs proposals so that they can complement one another. As an example of what could happen if the SEMs scope is expanded, a planning application has recently been submitted for a new community parkland at Cockham Wood (which forms Phase 1 of the SEMs work and is the example discussed in the consultation document), but the redline area appears to have been drawn to specifically exclude Cockham Wood Fort, a scheduled monument on the Heritage at Risk Register. The fort and scheduled monument extend up the riverbank into the woodland behind the gun batteries visible at the waterline. Had the fort been included within the community parkland, then there would have been opportunity to both improve the management of an at-risk monument and include an important heritage element to a new community green space. At present, the attraction of more people to the community woodland is likely to indirectly put more pressure on the monument, but with no corresponding opportunity for improved management or conservation.

#### 6 Managing Environmental Impacts (p56) & Historic Environment (p60)

The County Council would recommend that the historic environment is considered further within this section, including details of any preparatory studies that are required.

If heritage matters are to be addressed via an Environmental Impact Assessments (EIA), then it is essential that they are accompanied by a detailed and robust baseline desk-based assessment, which includes built heritage and historic landscape studies. In terms of the built heritage, this needs to include both designated built heritage and also non-designated buildings and structures, some of which will be of comparable significance to designated assets – e.g. those associated with the GHQ stopline only parts of which have been designated to date. For archaeological heritage, there is Pleistocene interest/Palaeolithic potential at several locations and specialist input may be required. It is recommended that any desk-based assessment should follow standard specification for desk-based assessments in areas with known Palaeolithic potential. There is also considerable potential for archaeological remains from later periods.

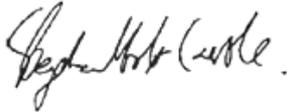
As per the NPPF paragraph 189, it should be anticipated that field evaluation works may be required in some locations to inform any future planning applications or the EIA itself.

---

KCC would welcome continued engagement as plans progress for potential growth opportunities on the Hoo Peninsula.

If you require any further information, please do not hesitate to contact me.

Yours faithfully,



**Stephanie Holt-Castle**

Director – Growth and Communities

Enc.

- [Appendix 1](#): KCC Heritage Conservation comments on the locations of the phases of the highways improvement works.
- [Appendix 2](#) - KCC Heritage Conservation comments regarding level crossings