



Medway Council Planning

Date: 6 April 2021 8 April 2021

Our Ref:

Your Ref:

By email only: futurehoo@medway.gov.uk

Dear Sir/Madam

RE: HOO - NEW ROUTES TO GOOD GROWTH CONSULTATION

I write with reference to the above consultation document that has been published for public consultation until 7 March 2021. We have taken the opportunity to prepare and submit our comments outside of the online survey due to the level of the comments that we have to make on the document. We trust that this approach is deemed to be acceptable.

It should be noted that we previously provided feedback on the previous consultation on Planning for Growth on the Hoo Peninsula via email dated 11 May 2020. As part of that submission we included a detailed technical desktop assessment on the feasibility of providing a new railway station at Hoo undertaken by Robert Skene Consulting. I have attached that technical report again to these representations as the report ended with the posing of 25 questions that Mr Skene considered needed answering in order to determine the true feasibility of the station proposals. There was no detailed feedback to this submission at the time and I note now that as part of the latest consultation the section on the Rail Proposals (section 4 of the consultation) does not seek to fully engage with the technical questions posed by our May 2020 submission. It is true to note that some of the matters raised have been covered such as the proposed electrification of the line (answering question 14) and alterations to level crossings (answering question 11). However, the more technical questions over capacity within the network and overall costings for operating the service along with likely demands remain unanswered within the material published. It may be that all of this technical information was set out within the original HIF submission bid but that material does not appear to be readily available online at this stage.

The opening section of the consultation states that “[This funding package supports the delivery of the essential infrastructure proposals which will enable emerging proposals for 10,600 homes to come forward. Decisions as to whether it is appropriate to allocate land for the development of new homes 10,600 or any other number of homes or other development will be made in the Local Plan process, and the decision to award HIF funding does not predetermine the outcome of the planning process.](#)” It should be noted that at the time of the announcement of the successful bid the South East Local Enterprise Partnership set out on their website (<https://www.southeastlep.com/central-government-awards-major-funding-boost-for-medway/>) that “[It was essential for the council to ensure that the necessary infrastructure could be put in place for its residents before preparing plans to develop 10,600 new homes on the Hoo Peninsula.](#)” It is therefore seemingly apparent that while the funding does not predetermine the eventual planning process it remains the preferred location for significant growth locally and that without the funding the option for such growth on the peninsula was unlikely to be achieved.

Perhaps the biggest unknown in all of this is the matter of the proposed timeframe for the delivery of the infrastructure programme of works, which is covered partially in section 2 and also section 7 in respect of third-party land and owners. Based solely on experiences with other local plans of late I must stress at this stage that I consider the timeframe to consult on the new Local Plan in Spring 2021 to have an adoption by the end of 2022 optimistic at present. It is more often the case now that Local Plan Examinations are split into two sections with the first focussed on the Duty to Co-Operate and then

strategic matters such as the overarching spatial strategy and housing/employment allocations, with the development plan policies following in Stage 2. Critically, the matter of deliverability of strategic allocations (in this case what we envisage to be a new garden settlement scale of development on the Hoo Peninsula) has been of critical focus in many a recent Examination with the example of the Tandridge Local Plan falling foul at present with its reliance on the proposed new Garden Village but highway capacity issues relating to junction 6 of the M25.

The commitment to delivery of the infrastructure to support the development at the Hoo Peninsula will therefore be critical and there does not seem to be much room for manoeuvre in the intended timeframe set out in section 2 assuming consents to be issued in the Summer of 2022 when the EiP would likely be occurring as well to gain adoption by the end of 2022. More telling however is the claim that all of the infrastructure works would be completed by Spring 2024 so somewhere in the region of 18 to 21 months after consent decisions would be made. Given the complexity of the infrastructure projects outlined in the consultation document, together with the ecological and environmental constraints that have been outlined, this seems an overly ambitious timeframe to deliver on all of the works.

The rail proposals outlined in section 4 state that “Construction work is likely to take two years to complete, but most of this work will be contained wholly within the development site.” This statement appears at odds with the timeframe set out in section 2 on my reading as there isn’t a 2-year period between the securing of the consents and the completion of the works. It is notable that the timetable for the Highway works is vaguer only stating that “We will seek to minimise disruption to the existing highway network during the construction period. Construction of the six packages is to be split into stages to avoid impacting the existing highway network.” There is no indication of the overall length of construction period, only that it appears that the works will not be undertaken simultaneously.

Ultimately, what is lacking in this consultation though is the detail of the need for these various works without the provision of the proposed additional new housing that is being debated. At all stages the consultation seeks to argue that these infrastructure works are not intended to predetermine the Local Plan process and the plans for the Hoo Peninsula, yet at the same time statements have been made that the works are absolutely essential to being able to consider such extensive development proposals for the area. What has not been outlined is whether lesser enhancements would be required locally if the scale of development to be proposed and potentially secured as part of the Local Plan process would be less than the quoted 10,600 dwellings.

The consultation document outlines some of the ecological constraints associated with the proposals, however what is silent in this is any reference to the emerging Environment Bill and the recommendations to ensure 10% net biodiversity gains from development. Clearly, there are large areas of land affected by the proposals and whilst we note proposals to establish new hedgerows and woodlands including more detailed proposals for the Cockham Community Parkland it would be of more value and assistance if thought were given at this stage on what such proposals are likely to mean in regard to overall net biodiversity gain. It is clear that this element still requires considerable work, noting that the consultation itself states that further discussions will take place over the next 2 years. It is noted however that proposals for the Cockham Community Parkland appear more advanced and an application is due in early 2021. This therefore poses a question over whether the benefits of this scheme will be applicable to the wider infrastructure programme and the net biodiversity gain. Being an entirely separate proposal that is not intrinsically linked to the infrastructure programme I do not believe that it would be legally connected for the purposes of biodiversity gain meaning that by the time of the proposals for the infrastructure more may be required to address this pressing matter. It should be noted that the current consultation on potential changes to the NPPF make specific reference to improving biodiversity (paragraph 8c, 11a and 179d).

The consultation sets out that the wider Strategic Environmental Management Scheme (SEMS) is still in early stages of development and is therefore separate to the road and rail components of the HIF scheme. Again, this will need to be carefully considered in light of the potential revisions to the NPPF where this is an increased emphasis on improved safe pedestrian and cycle routes (see paragraph 92b and 105d for example).

Ultimately, we remain concerned at this stage over the level of detail that has been made publicly available in respect of the scale and impact of these infrastructure proposals. The lack of a current published timetable for the highway works is concerning given the publication of the high level timetable

for the railway proposals. As per the earlier May 2020 submission, there remain questions over the capacity within the railway network for the proposals as outlined. This is even more relevant noting the comment in this consultation that it states “A half hourly service is proposed. There is scope for the frequency of the service to be increased in line with demand in future national timetable updates as the patronage at the station increases.” Our consultant has raised the question over the capacity before the suggestion of increasing frequencies further depending on the level of future demand.

Yours sincerely



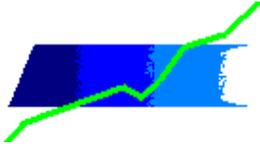
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DIRECTOR

For and On Behalf Of

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Enc: Robert Skene update



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22 February 2021

Dear Richard

POSSIBLE HOO STATION

Thank you for your emails of 19 February, as instructed we have examined the rail aspects of the consultation document *Hoo – New Routes to Good Growth*, Medway Council, undated (but understood to have been published in recent weeks) (the Consultation Document), and have compared it to our report *Proposed Station at Hoo – Initial Desktop Report*, of 12 May 2020 (the Initial Desktop Report). We have examined the following issues:

- the extent to which it answers the twenty-five questions raised in our Initial Desktop Report, and also those put in the final paragraph of our report;
- how the extra information given enables the proposals to be understood better;
- whether this changes the Initial Desktop Report in any material way.

These issues are covered on a discipline-by-discipline basis in the following sub-sections of this letter.

Our first comment, however, is unrelated to these issues, and is to register our surprise that this document appears to be undated, which is something that we would not regard as good practice.

Questions Raised in the Initial Desktop Report

These were as follows:

1. Between which stations is it proposed that the service would run, given that Platform 2 at Gravesend Station can no longer terminate trains

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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 is 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 annual costs. What are the estimated annual 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 giving a firm and binding commitment to support CAPEX, and/or OPEX? If so by how much?

In addition, questions needed to be answered in respect of the anticipated demand, and the financial and economic viability.

Proposed Track Layout

The Consultation Document includes a, basic, indicative track layout for the proposed scheme (Figure 17, repeated as Figure 31, therein). This is not a full schematic track layout, but appears to give a good impression of the main proposals. Insofar as the operation of the Grain Branch is concerned, standout points are that it is indeed proposed that a separate terminal platform for passenger trains would be provided at the new Hoo Station, and that an extended passing loop would be provided at Cooling Street.

These measures should answer RSC's concerns in respect of the operational feasibility of the Grain Branch, and should permit the operation of a half-hourly passenger service on the Branch, as least, provided that line speeds are increased, something that the Consultation Document does not discuss, merely stating that line speed would be increased.

However, the proposed works go well beyond the minimum identified by RSC in that the Branch would be doubled between Hoo Junction and Cliffe Junction, with what appears to be a complex (and thus expensive) junction layout at Cliffe Junction, and, it appears a major revision to the layout at Hoo Junction, with a lengthy loop to access the Branch on the Down Side. It is presumed that NwR's *Railsys* modelling has identified that these works are required to deliver the required degree of timetable robustness. It is unclear whether the proposed new Down Loop at Hoo Junction would just be used by Down trains, or whether it would be reversible, which in turn would also require a new crossover to be installed to the West of Hoo Junction, so that Up trains could cross to the Up line. As the Consultation Document states, correctly, this would necessitate widening the formation (which would have other knock-on impacts), and reconstructing a number of bridges.

RSC considers that the extra works identified in the Consultation Document would increase the CAPEX beyond the baseline figure identified in the Initial Desktop Report of the scheme by several tens of millions of pounds.

Signalling & Level Crossings

No information is provided on the signalling works proposed in the Consultation Document; however, it is inevitable that track layout shown therein would involve a major and comprehensive resignalling, and that furthermore the works would be well beyond the capabilities of the existing Hoo Junction SSI interlocking. Thus, the heavy resignalling costs predicted by RSC, appear to be to justified, indeed the, apparently, complex layout proposed at Cliffe Junction, and the major reconfiguration of Hoo Junction that appears also to be proposed would increase the costs of this still further, beyond those envisaged in the Initial Desktop Study.

The proposals in respect of track crossings are covered well in the Consultation Document, and indeed the other public crossings are also well covered, a subject which we had not investigated in our Initial Desktop Report, due to constraints of time. In all cases it is proposed to replace track crossings by grade separated crossings (in two cases this would involve amalgamating crossings), this is very much a 'Rolls Royce' solution, which would involve a further significant CAPEX increase, beyond those we estimated previously.

While the elimination of at grade crossings is to be welcomed from a position of maximising safety potential¹, this has to be leavened by economic reality, to arrive at a pragmatic solution, delivering safety at an affordable cost. A perpetual problem with any third-party funded scheme, is that NwR's engineers tend to regard them as a *carte blanche* for wish-list engineering, irrespective of cost, or financial viability. It appears to me that the promoter is being 'led by the nose' by NwR in this regard whereas to deliver value for money, promoters need to 'push back' against NwR's culture. This gives us a much wider concern about this promoter's ability to manage the scheme effectively, and control costs, given NwR's endemic inability to control costs.

There is no doubt that these proposals can only take the proposal even further from any prospect of financial viability, and could only be good news for those who would not wish the scheme to proceed.

The forgoing should not be taken as a criticism of NwR's staff, the majority of whom are highly professional, and have outstanding expertise at their jobs; save for a tendency of the more cautious individuals in the industry to gravitate towards it. The issue with NwR is the culture of the organisation, which has regressed even further in recent years, as it has effectively become little more than nationalised arm of government, alongside the body that was supposed to regulate it, and no longer does so effectively, in our view.

Proposed Train Service & Speeds

The Consultation Document states that a half hourly service would be provided, presumably throughout the daytime period, this accords with RSCs assumptions in the Initial Desktop Report, and would seem to be a sensible starting point for financial and economic evaluation. With the being service fine-tuned under sensitivity analysis in a detailed evaluation.

¹ Unfortunately, introducing new overline structures in place of at grade crossings replaces one set of risks with another, notably that of persons (predominantly young males) dropping heavy objects on passing trains. Given the social issues that exist on the Hoo Peninsular, this is not a trivial risk in this location.

What the Consultation Document fails to explain is where the service would operate to, other than that Gravesend would be served. RSC can only presume that a pair of existing services that terminate at Gravesend currently, would be extended, as envisaged in the Initial Desktop Report, given that there appears to be no other feasible option to RSC. However, given that the Consultation Document is a public consultation document, this omission of any mention of the destination of the trains that one might catch is curious.

The Consultation Document also fails to make any reference to the journey times that prospective passengers might expect to any potential destination. While, given that this a public consultation document, one might excuse the lack of detailed technical and financial information, RSC finds the omission of this, absolutely key, piece of public information, extraordinary. Indeed, the cynical might even suspect that that this might be deliberate, given that RSC believes that journey times are only likely to be competitive with other modes on the Gravesend-Dartford corridor. As a reminder, RSC's journey predictions, based on its assumptions, and upgrading the Grain Branch for 60 mph running were as follows:

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 is confirmed in the Consultation Document that “*an interchange option at Gravesend to link to locations across Medway*” would be provided. This is consistent with the assumptions made by RSC in *Initial Desktop Report*. However, the implication that this would provide a credible linkage to the Medway towns is frankly risible in RSC's view. RSC suggests that the end-to-end journey times offered to the Medway Towns would be grossly uncompetitive with the road alternative, and are likely to attract minimal levels of patronage therefore. RSC considers it imperative that the promoter is pressed strongly on this point, to avoid the potential for a waste of a considerable sum of public money. It is likely that an express bus service would be faster, as well as vastly cheaper to provide.

Another surprising omission is the lack of any information about the proposed change to the line speed on the Grain Branch. Not only is this key to providing an attractive service for potential users, in a consultation document, those living in proximity to the alignment have a right to know, given that the higher the line speed the higher the noise levels generated would be (even though the wider economic benefits of higher line speeds are likely to be greater than the disbenefits suffered by a relatively small number of people).

RSC remains concerned that there might be an issue with platform capacity at Gravesend Station, particularly in the peaks. The Consultation Document sheds no light on this issue whatsoever.

Proposed New Station

A reasonable level of detail is provided on the proposed new station at Hoo, with two potential designs presented. These have confirmed RSC's worst fears, in that a large architecturally designed station building is proposed, which it is suggested is not only likely to be of a scale that is out of all proportion to the number of passengers likely to be using it, but is a facility that is not required. Again, this could only result in a multi-million pound increase in scheme CAPEX.

Even more curiously the illustrations in the Consultation Document do not show any platform shelters or canopy to protect users from inclement weather. Thus, an architectural statement is being made at the expense of facilities that users actually need, and that are likely to make the travelling experience tolerable on a wet day, and whose absence would discourage its use. Similarly, the station building is shown set with a large plaza in front it, which appears to serve no purpose other than to make the station building appear more architecturally impressive: in inclement weather this would create a wide wind and rain swept area², making use of the station unpleasant for potential users, and discouraging its use.

RSC suggests that all that is required is a basic single platform, ticket machines, platform lighting, passenger information systems, CCTV, a suitably-sized well-light car park, and a low-cost proprietary platform canopy system around 30-50 metres in length, with a single, small shelter. Any more than this would increase RSC's Capex estimates.

Curiously *Figures 18, 19, and 20* in the Consultation Document show a station footbridge, which given that a single platform is proposed, and there is an existing road overbridge adjacent to the proposed station site, appears totally unnecessary, and a further waste of money.

Without any estimated patronage figures, it is impossible to comment on whether the size of the proposed car park is appropriate. The drawings in the Consultation Document appear show slightly in excess of 240 car park spaces, sufficient for a modestly used terminal station, with space for further expansion. This provision would need to be reviewed once the likely patronage has been established.

RSC considers that the proposed juxtaposition of the car park with respect to station entrance is poor: rather than being centred around the entrance, as it would be with good design, it is shown as set to one side, with a lengthy walk distance to reach the platform from the far side of the car park, extended still further by the aforementioned plaza. Given, that for relatively short-distance trips every minute saved, and reduction of interchange penalties, in comparison to rival modes offering similar journey times is crucial to driving up usage, this appears an unnecessary 'own goal'.

RSC regards the promoter's station proposals as another sign that considerations of viability and cost-effectiveness are not being considered appropriately, and that the CAPEX of the scheme appears to be out of control.

² I am aware that the Hoo Peninsular can be a particularly bleak and wind-swept spot, as I grew up in North Kent, attending grammar school in Gravesend, and sailed on this part of the River Medway for many years thereafter, with my boat being based at Hoo. Any station design needs to reflect the local environment, and be of a design that is appropriate to it: my local knowledge insists that the current proposals are not.

Further, the subjugation of user needs to aesthetic considerations does not bode well for the chances of delivering a successful project, able to attract enough paying customers.

Costs, Revenues & Viability

This document makes no mention whatsoever of the costs of the scheme (other than a total of £170M for the entire Hoo Peninsular infrastructure plan, the great majority of which, and possibly more, would be likely to be consumed by the rail proposals outlined in the Consultation Document), nor of the anticipated patronage or revenues (in a post-Covid World). In consequence no mention is made of the anticipated NPV of the scheme in either financial or economic terms.

RSC remains convinced that this proposed scheme has no prospect whatsoever of being close to financial viability under any competent analysis. Indeed, the additional details provided in the Consultation Document, would serve to take the scheme even further from being viable, even before any cost inflation resulting from our suspicions the promoter does not have NwR under tight rein are factored in.

Similarly, we remain sceptical that scheme would not even be able to recover its operating costs.

Summary

In summary, following study of the information given in the Consultation Document, the position in respect of the questions raised by RSC in its Initial Desktop Study are as follows:

Question	Answered	Not Answered	Partial Answer
Q.1		X	
Q.2			X
Q.3		X	
Q.4		X	
Q.5	?		Gravesend?
Q.6		X	
Q.7		X	
Q.8		X	
Q.9		X	
Q.10		X	

Question	Answered	Not Answered	Partial Answer
Q.11	✓		
Q.12	n/a	n/a	n/a
Q.13		X	
Q.14			X
Q.15		X	
Q.16		X	
Q.17		X	
Q.18		X	
Q.19		X	
Q.20		X	
Q.21		X	
Q.22		X	
Q.23		X	
Q.24		X	
Q.25		X	
Anticipated Patronage		X	
Estimated Revenues		X	
Financial Viability		X	
Economic Viability		X	

Overall, we see little reason to change our earlier view that it is unlikely that this project is likely to be even close to either financial or economic viability. While, other than for some potential concerns about the operation of Gravesend Station and Hoo Junction, we are fairly comfortable that the proposed Hoo station could be built and a passenger service could be operated over the Grain Branch, we consider the costs of so doing are likely to be out of all proportion to the benefits that are likely to be delivered. Indeed, the Consultation Document raises even more concerns than it answers, given that it appears that technical overkill is being employed, and that the costs appear to be out of control.

Equally fundamentally, we doubt that competitive journey times would be offered to more than a handful of locations that residents of the proposed new development would actually wish to go to.

As ever, we remain at your disposal to discuss this matter further, or to answer any questions that you might have.

Yours Sincerely

A handwritten signature in black ink, appearing to read 'Rob Skene'. The signature is written in a cursive, flowing style.

Robert Skene
Director
for Robert Skene Consulting Ltd