

CONTEXT

This document endeavours to summarise the primary concerns of the local community and draw attention to expert opinion regarding the application **MC/19/1566: Outline planning for redevelopment of land off Pump Lane**.

An unprecedented proportion of the local community **OBJECTS** to this planning application. This document does not replace any of the 3,225 objections to date but due to the overwhelming number, it seeks to act as a supplementary document, which highlights the primary points that concern the overwhelming majority of residents in and around Rainham. As a small group formed from over 3,000 members we would urge Planning Committee members to consider this document, in addition to all Resident objections and statutory responses. It is our firm belief that any Planning Member who does, would not be able to justify voting in favour of this proposal.

The planning application has received just 22 letters of support, with 16 of those coming from businesses, all of whom supply AC Goatham and receive revenue from AC Goatham. None of those businesses are located in the area that will be impacted by the introduction of 1,250 new homes with inadequate measures and provision for the environment, infrastructure and local services.

Additionally, it should be noted that this application has prompted the following actions from the local community, which further highlights how strong the community sentiment is;

- A Facebook page¹ with over 3,000 members, growing at a rate of approximately 50 new members per week.
- An unprecedented 3,316 objections on the Medway Council Planning Portal Website.
- Hand delivery of a petition with 2,876 signatures to AC Goatham², to which no response was received.
- Held 6 community protests, which the local MP and Ward Councillors attended in support.³
- Raised funds from the community to raise awareness of this development, with 3000 posters and over 30 banners being displayed in the local area.
- Conducted radio interviews with KMFM news⁴.
- Conducted interviews with KMTV and local newspapers.⁵
- Commenced applications to reinstate Public Right Of Way which was closed by AC Gotham after application.

The community has signalled their intention to lobby and fight against this application for as long as it takes until it is rejected in full.

The intention of this document is therefore twofold:

1. To convey the strength of feeling residents in the local community have against this development.
2. To provide an objective, fact-based summary of key concerns and draw attention to anomalies in the application documentation.

Signed

Pump Lane Steering Group

Land registry – sale of land

PROW

¹ "Against The Development of The Orchard, Pump Lane" <https://www.facebook.com/groups/431934077337243/>

² <https://www.kentonline.co.uk/kmtv/video/protests-in-rainham-over-new-housing-plans-26751/?fbclid=IwAR0mRX9yBPVcWMcbZAK7ZxRjvShU7aG0Fps9DLB8NCVqpDFgoQ77CzYef98>

³ <https://www.kentonline.co.uk/medway/news/people-protest-against-housing-development-208637/>

⁴ <https://audioboom.com/posts/7343968-listen-ila-hewitt-is-part-of-a-group-campaigning-against-the-development-of-more-than-1-200-new?fbclid=IwAR0fYhsC4X1eWGg-EDh0OP0T2qcf9-9 k O8-BuKMi9xwSiGGZ1uH4BhzLU>

⁵ <https://www.kentonline.co.uk/medway/news/hundreds-unite-against-plan-for-1-250-homes-209127/>

PRIMARY TRAFFIC POINTS TO CONSIDER

- The applicant's **Traffic Assessment** documentation⁶ is heavily biased and contains assumptions which are vastly optimistic. The proposal cites 1,250 houses, a 350 pupil school and 140 beds for care homes. Based upon an average of 1.5 cars per household⁷, there will likely be a 2,000 + vehicles increase around Lower Rainham Road and Beechings Way, both of which feed the SRN (A2 and M2). It is impossible for so many more vehicles in the vicinity to not have a substantial impact on the area, which in turn will impact the SRN, especially as 34%⁸ of households are likely to have two or more vehicles. Furthermore, the applicant cites access as a significant impediment to continued economic farming, This raises significant questions over how the existing access would support a 10 year development of unprecedented scale and complexity, in rural lower Rainham.
- The Traffic Assessment documentation states 29 vehicles will travel to the new school to drop off the 350 children who will go there. This represents 8%, yet **DFT National Travel Survey** statistics show that 49% of households⁹ use vehicles to drive their 5-10 yr old children to school. Furthermore this figure has remained consistent for 22 years "*..trips for purposes such as education, escort and leisure have changed little since 1996*"¹⁰.
- In total the report suggests an extra 430-480 trips during peak hrs as a result of this development, however this represents ~23% of the estimated 2,000 vehicles and **DFT National Statistics** suggest that the average number of trips per person is comprised of 75% by Car, with just 8.45% made up from walking. Additionally, car is the dominant mode of transport regardless of purpose of trip. The figures in the traffic assessment are clearly not plausible and are greatly underestimated.

Purpose of Trip	% by Car	% walking
Business	4%	0.2%
Entertainment	6%	0.2%
Education	6.2%	1%
Commuting	12%	0.8%
Shopping	15%	1%

DFT Statistics: Trips by mode and purpose (short walks excluded): England, 2012-2016

- **NPPF Policy** states that priority should be given to pedestrian and cycle movements in order to create places that are safe, secure and attractive. An increase in the number of vehicles as a result of the proposed development will increase the risk of accidents. **Access to NCR1 is already severely compromised by acute traffic flows on the Lower Rainham Road.**
- **Department of Transport** figures¹¹ state that the national daily average for a rural road is rising from 1000 to 1400 for the South East (1800 for all minor roads). The applicant's traffic assessment states current volume is 8044 vehicles in a 12-hour period. There is already **over 4 times the traffic volume on the Lower Rainham Road than the DoT average figure**, which degrades air quality and increases issues relating to safety. In fact the Traffic Assessment notes there have already been 20 accidents on the Lower Rainham Road, with over a third of those being serious or fatal.
- The Applicant's **Traffic Assessment** cites figures which highlight that in **1 hour at peak traffic times**, the volume of traffic around the Lower Rainham Road already **approaches the national average for volume in a 24 hour period**, based upon DFT statistics¹².
- Despite the Applicant's suggestion that there is no relationship between the A2, Lower Rainham Road and the SRN, several occurrences in the last 9 months have shown that driver behaviour proves this is not the case. On three occasions, there have been road accidents and road closures on the M2, which has led to virtually all the traffic being diverted. This has caused incredible congestions on Beechings Way and the Lower Rainham Road, as well as those roads which connect the two (Pump Lane, Eastcourt Lane etc).

Based on the above, we believe a development of this scale would have a significant impact on transport infrastructure and it would significantly increase the number of vehicles and volume of movement on the roads. This, in turn, will impact the SRN. This proposal is contrary to Medway Policies T11, T18 and NPPF paragraphs 104, 108c, 111 (current assessment is misleading).

⁶ [D Tucker Traffic Assessment Documentation for AC Goatham](#)

⁷ [NTS0205: Household car availability: England](#)

⁸ [DFT Transport figures](#)

⁹ [NTS0409: Chart 18, DFT National Travel survey 18 January 2018](#)

¹⁰ [DFT National Travel Survey 18 January 2018](#)

¹¹ [DFT TRA0301: Motor Vehicle Flow 1993 - 2018](#)

¹² [DFT TRA0302: Motor Vehicle Flow 1993 - 2018](#)

PRIMARY ENVIRONMENTAL POINTS TO CONSIDER

- **Natural England** noted *“This application could have potential significant effects on the Medway Estuary and Marshes Site of Special Scientific Interest, Special Protection Area and Wetland of International Importance under the RAMSAR convention and the Medway Estuary Marine Conservation Zone”*.¹³
- **Kent County Council Ecological Advice Service** comment, *“The proposed development will negatively impact the site boundaries and species present due to an increase in disturbance from a number of factors including an increase in lighting, noise, recreational pressure”*.¹⁴
- **Kent County Council Archaeological** noted *“This scheme has the potential to affect a range of heritage assets, both designated and non-designated, including buried archaeological remains...”*¹⁵. They go on to say *“The ES suggests that the proposed development will have minor effect on the setting of the two conservation areas, but we think the impact will be much greater.”*
- **Kent County Council Archaeological** also noted *“We have concerns about the impact of the development on historic landscape character and the setting of designated assets, including impacts on the setting of two conservation areas and individually listed buildings...”*. They finish by saying, *“Historic England have set out criteria by which Palaeolithic sites might be defined as ‘nationally important’. Because they are so rare in Britain sites which at which Palaeolithic artefacts are particularly abundant, such as Twydall, should be regarded as of national importance”*.¹⁶
- **People’s Trust for Endangered Species** notes *“The scale of this development would demand that compensation measures would need to be immense....the loss and/or degradation of 7 km of mature ancient high hedgerows alone would require the compensatory planting of at least 70 km (a modest 1:10 replacement ratio) of new hedgerow habitat”*. However they do note *“I do not, however, believe the loss of so much critically sited land to development could ever be adequately compensated.”*¹⁷
- In reference to the ecological assessments, **People’s Trust for Endangered Species** states *“Fifty hectares of developed land will definitely have a warming effect on the local microclimate. As the climate continues to warm this will exacerbate problems caused by climate change”*. They also offer the opinion, *“The effect on the SSSI/RAMSAR estuarine environment of concreting over 50 hectares of agricultural land is incalculable. The water table beneath Pump and Bloors Farms cannot help but be dramatically affected by the reduction of natural water ingress, which will translate to unknown changes in the estuary.”*¹⁸
- As of May 2018, the **World Health Organisation** has cited Medway (listed as Gillingham) as being the 5th worst town in the country for air pollution. London is listed 21st.¹⁹ A development of 1,250 houses, resulting in a conservative estimate of 1,750 – 2,000 cars (1.4 cars per household²⁰) would undoubtedly exacerbate this.
- **Medway Council’s 2018 Air Quality Annual Status Report** acknowledges *“The main source of air pollution in the district is road traffic emissions from major roads, notably the M2, A2, A228, A229, A230 and A289...Medway suffers from significant congestion”*.²¹ The report goes on to state, *“Road transport is the dominant source of pollution and reducing road traffic emissions is, therefore, the key air quality priority. Another significant challenge is accommodating the large demand for development in Medway. This is likely to put existing areas of poor air quality under additional pressure, and could negate the actions that the Council is implementing to improve air quality”*. It is clear that this proposed development will not only worsen the situation, but it could actually impact and reverse the Council’s actions to improve air quality.

Based on the above, we believe a development of this scale would be overly intrusive and dominant for the local area. There would be a substantial impact, both visually and materially on the area. Wildlife, greenery and significant ecological sites would be adversely impacted. Replacement of agricultural land with over 50 hectares of concrete would increase flood risks, contribute to global warming, impact air quality and affect listed buildings. This proposal is contrary to Medway Policies BNE6, BNE 24, BNE25, BNE34, BNE37, BNE 42 and NPPF paragraphs 98, 102, 103, 111, 118, 119, 122, 144, 155, 170, 175, 180 and 181.

¹³ MC_19_1566-STATUTORY_-_NATURAL_ENGLAND-5407835

¹⁴ MC_19_1566-STATUTORY_-_KCC_BIODIVERSITY-5417388.pdf

¹⁵ MC_19_1566-STATUTORY_-_KCC_ARCHAEOLOGICAL-5407649

¹⁶ MC_19_1566-STATUTORY_-_KCC_ARCHAEOLOGICAL-5407649

¹⁷ Peoples Trust for Endangered species Comment-on-MC-19-1566-1

¹⁸ Peoples Trust for Endangered species Comment-on-MC-19-1566-1

¹⁹ <https://www.bbc.co.uk/news/health-43964341>

²⁰ <https://www.statista.com/statistics/314912/average-number-of-cars-per-household-in-england/>

²¹ 2018 Air Quality Annual Status Report (ASR): Medway Council

PRIMARY HEALTH AND COMMUNITY POINTS TO CONSIDER

- The applicants environmental report²² assumes a population increase of 3,100 persons, resulting in a total of 24,087 patients to be covered by 10 GPs currently based in Medway. This would mean approximately 2,408 patients per GP, which is **considerably above the recommended 1,800 capacity limit set out by NHS**. This application alone would increase the number of **patients per GP by over 300**, representing an almost **15% increase in demand** for GP services.
- Very few local GP's are accepting new patients, a stark contrast to information in the applicant's report²². Service pressures from new residents would increase demand on a much larger scale than shown above, among a smaller number of GP's.

GP Practice	Planning Application Data Accepting patients?	Pump Lane Steering Group Enquiries (July 2019) Accepting patients?
Waltham Road Medical Centre	Yes	No
Pump Lane Surgery	Yes	Possibly. GP may retire
Orchard Family Practice	No	No
Thames Ave Surgery	Yes	No
Dr Vridhagiri Nandini	Yes	Yes
Maidstone Road Rainham Surgery	Yes	No

- 2011 Census data²³ highlights that the proportion of residents in the Rainham North (81.31%) and Twydall (77.91%) wards that **consider themselves to be in a 'good' or 'very good' state of health is lower than the average** of Medway (81.96%), the regional average (83.63%) and national average (81.38%).
- **Services across Medway are close to capacity**, with acute occupancy over 90%; a number of providers in special measures; a high ratio of patients to GPs and **a number of GPs giving up general medical services (GMS) contracts or retiring**²⁴.
- Medway population growth in the over 65s is expected to be over 4 times greater than those under 65; an aging population means increasing demand for health and social care²⁴. Furthermore, an older population will see **increasing numbers of those with chronic conditions**, becoming intensive users of services.
- Kent and Medway population is set to grow rapidly, faster than Office for National Statistics projections. Medway has **planned significant housing growth aimed at commuters and new families** and it is therefore expected the new population will **place pressure on paediatric and maternity care especially**²⁴.
- Medway Maritime Hospital 'requires improvement'²⁵ overall, with 27% of patients missing A&E waiting time targets - four times higher than July 2018.²⁶
- The NPPF²⁶ states *"It is important that a sufficient choice of school places is available to meet the needs of existing and new communities"* and that *"Local Planning Authorities should give great weight to the need to create, expand or alter schools through the preparation of plans and decisions on applications"*.
- It is clear from the applicants documentation²² there is a significant capacity deficit of over 300 primary school places within 3KM of the site, and that a development of this size (over 750 units) would require provision of a school by itself. The application sets aside 2.6Ha for the Primary School. However, there is no clear forecast of
 - Primary School needs for the local population, taking into account this development and others already approved
 - How, in numbers, the new Primary School will meet this need

Based upon all of the above, we believe a development of this scale will place severe pressure on already overstretched primary health services, putting local lives at risk and exacerbating capacity issues. There will be significant impact on:

- Local GP services, which are already primarily operating above capacity**
- Medway Maritime Hospital which is under-performing and operating above capacity, with the population expected for new housing developments placing particular pressure on maternity and paediatric services**

²² [MC 19 1566-ENVIRONMENTAL STATEMENT MAIN TEXT](#)

²³ [Medway 2011 Census Report](#)

²⁴ [Transforming Health and Social Care in Kent and Medway - Sustainability and Transformation Plan](#)

²⁵ [Medway Maritime Hospital Annual Report, 2018-19](#)

²⁶ [A&E departments missing four hour target](#)

²⁶ [National Planning Policy Framework](#)