

*My name is Ila, I'm a local resident who has grown up in Rainham and watched it develop (for better or worse) over the past 39 years.*

*I'd like to begin by introducing ourselves and to provide some context about who we are.*

*Collectively, we form part of the Pump Lane Steering Group.*

*We are part of a group that formed organically in November 2018, just a short time after we learned of the planned development off Pump Lane. As local residents, a small number of us started to voice our concerns about the potential development and the impact it would have on the community and local landscape. This quickly grew to a Facebook group with over 3,200 members and thus the Pump Lane Steering Group was formed.*

*We are here today to try and provide a voice for that community. A community who submitted over 3,300 objections to the outline planning application, a community who have held 6 public protests, created a petition containing over 2,800 signatures and who have displayed over 3,000 posters in their homes for the past 18 months to show how strongly they feel about this development.*

*We hope that today we can provide you with a Resident's perspective. These are the views of the people who live in this area and who stand to be directly impacted by this development for decades to come. Now, we are not experts. We are not planning consultants, who are paid to achieve the most favourable outcome for their client. We are not the Appellant, who stand to make millions of pounds from this development, despite not living here and therefore not truly feeling the negative impact it would have on the area. We are also not the experts that the Appellant has employed, to present complex and optimistic statistical models which do not reflect reality. We are also NOT NIMBYs. I hate to even mention that word, but please understand that we are not here today, objecting to any and every development as a way to block progress. We appreciate the need for housing and we understand that new houses need to be built somewhere.*

*What we want to ensure is that truly affordable housing is built in the right place, with sufficient infrastructure to support those new homes. We also want appropriate care and consideration for the environment and for the existing residents of the area. And this development does not address any of those points. Furthermore, the Appellant's appeal does little to address the Council's reasons for refusing planning permission so far.*

*Before handing over to my fellow Steering Group Members, I would like to highlight three facts:*

- Firstly, Medway Council has clearly stated that their imminent draft local plan satisfies the housing requirement for this area on sustainable sites and the Appellant's proposed development does not form part of that plan. Indeed Medway Council's SLAA (strategic land availability assessment) agreed by cabinet in December 2019, stated that this was not a suitable or sustainable site for development.*
- Secondly, the data in the Appellant's documentation does not reflect reality. My fellow Steering Group Members will expand and share many examples of this in due course.*
- Thirdly, Medway Council refused this application for 9 reasons. The Appellant's appeal statement has addressed only 5 of these objections with the following words used: "discussions are **ongoing** and it is **anticipated** that this matter will be resolved". There is no factual basis upon which that assumption is made, other than the Appellant wishing that these reasons disappear. The fact is that these issues cannot be addressed. It is impossible to double the number and width of the roads around the development site, due to existing housing. It is impossible to mitigate the environmental issues and the irreversible impact this development would have on the local ecology.*

*It is therefore clear that this appeal must be rejected.*

*I would now like to hand over to Paul to address the local community's concerns over Traffic.*

*My name is Paul and I have 2 teenage daughters for whom the lower Rainham countryside, including the Riverside Country Park and Saxon Shoreway is currently at the cornerstone of their social life. For them, as for many thousands of local residents, this green lung provides a unique estuary and increasingly rare clean air landscape in Medway.*

*In this regard, I'd like to talk about what this development will mean for traffic and congestion on already inadequate roads, as evidenced by dozens of community posts, photographs and videos showing 2 miles of stationery traffic stretching from Pump Lane to the end of the Lower Rainham Road.*

*The appellant is no doubt acutely aware of the over capacities on these roads during these peak times and the dangers to cyclist and pedestrians as a consequence.*

*Indeed, their own study supporting their original application states there are over 8000 (8044) vehicles using them, in a 12-hour period. This compares to figures in the public domain from the Department for Transport saying the average for rural roads to be 1000, rising to 1400 in the South East. It is only 1800 for minor roads confirming that there are already 4-5 times the number of vehicles using the Lower Rainham Road than the national average. Looking at their figures more closely we see how polarised this traffic is at peak times; in 1 hour it approaches the national average in 24 hours elsewhere in the South East.*

*Their recently published so called "overall access strategy" issued by the appellant merely details how vehicles will access and exit their development.*

*It does not, because it cannot, address the physical impediments restricting traffic flows on the Lower Rainham road, notably the single lane sections at bottom of Pump Lane due to the cottages and existing housing and bridge restrictions thereafter.*

*The council has over recent years already approved 866 new homes and potentially 1300 vehicles between Otterham Quay Lane and the proposed development, which feed directly into these pinch points. In the 1 mile section from the bottom of Pump Lane there are 4 locations in which the road narrows to only allow one vehicle to pass, 2 of which are signal controlled. Even under the current circumstances, these create long queues and we are all aware that any issues on the M2, immediately transfer onto the Lower Rainham Road and Beechings Way, bordering the proposed development. Once again, there are testimonies in our Facebook community to journeys taking hours to cover just a couple of miles due to these afformentioned constrictions.*

*The measures they have outlined cannot overcome these immoveable obstacles and in our opinion are simply a smokescreen to the fact that this decade long development will, during construction, exacerbate an already acute traffic problem at peak times along adjacent roads and once completed, will overwhelm them with vehicles. It brings a decade of additional construction traffic and thereafter 2000 vehicles to the epicentre of the problem and the subsequent standstill that it will create, together with the air quality, pollution and road safety implications.*

*And yes, I said 2000 vehicles, because the community believes strongly that the traffic assessment documentation in the Appellant's submission is frankly misleading.*

*It cites that 1,250 houses, a 350-pupil school and a 140-care bed home will not significantly impact traffic in the area. Can I please ask everyone to think about that statement for a moment?*

*How many households in this type of semi rural setting have less than two cars? Well, DFT statistics from 2018 state that in general 34% of households actually have two or more cars. If we were to be generous and assume an average of 1.5 cars per new household, that is nearly 2,000 more vehicles spilling out onto the inadequate Lower Rainham Road and Beechings Way. How can that not impact the area?*

*The documentation assumes that people will walk to the shops and supermarket which is 1.5 miles away in Rainham. How many of us know people who walk 20 minutes to do their shopping? and then walk 20 minutes back carrying their bags?*

*The documentation also says that 29 vehicles will travel to the new school each day to drop off pupils. That covers just 8% of the pupils. Presumably the other 92% of pupils will be walking. Yet DFT national survey*

travel statistics cite that the average percentage of parents who drive their children to school is 49%. 49%, not 8% which is six times greater than the analysis in the documentation. Of course, the Appellant will have lots of alternate statistics which support their view and refute these Government statistics. So, let me ask this. How many of us don't drive our children to school? How many of us have driven past a school, anywhere in the country, be it primary or secondary at 08:30am or 3:30pm and not been in traffic jams, including Rainham Mark Grammar school situated upon Pump Lane?

This all needs once again to be considered in the context of the 866 houses in recent and current developments, using the already overwhelmed Lower Rainham road at peak times. This road runs between a conservation areas, community orchards, a country park and a SSSI/Ramsar site. A unique estuary ecology with community facilities for all ages and promoting mental wellbeing for all its many visitors. Far from creating local amenity for pedestrians and cyclists, this proposed development concretes over the very landscape people currently cycle and walk to enjoy and it would make the car and the issues that accompany them, the overwhelming and dominant feature of lower Rainham forever.

Thank you Ila,

My name is Kate, I am a self-employed mother of 2 young children and have lived in Medway since the age of 5 and here in Twydall for the past 5 and half years. I am a passionate member of this community, and am here today to represent all of those in Rainham & Twydall, whom like me are raising children in what is arguably becoming the most difficult time in any of our life-times. The past 2 years has been somewhat of a paradigm shift for me, as I have come to terms with what fight lays before us, a fight for the successful continuation of ours and thousands of other species. Never before has the care of the natural world been so important.

So today I would like to talk to you about the irreversible destruction that this proposed development would have on the environment, the ecology and biodiversity of this area, something which "biodiversity net gain" cannot make up for.

You will of course have seen the analysis from environmental experts who reviewed the original application. **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".

**Kent County Council's Ecological Advice Service** said, "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".

And **Kent County Council Archaeological** 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..."

In fact, there is not a single environmental professional that the Appellant consulted who thinks this is a viable site. Because this is an attack on local protected sites. The Appellant wants to destroy 60,000 apple trees and 7km of ancient hedgerow and replace them with nearly 50 hectares of concrete. Yes, they will plant a few trees and create some borders. But this will not be sufficient and it will have a severe and negative effect on nearby protected sites such as the estuary and marshes.

Even the Appellant, in their appeal submission have admitted that the effect on the landscape will be major. And they are not my words – I quote directly from their documentation where they have admitted that this ten year development will create a major adverse effect on the local landscape. They go on to state that they expect this adverse effect to reduce to moderate AFTER 15 years. And that is 15 years after the ten year construction period. But of course this irreversible destruction by the appellant would be finite and forever. A grave to the orchards which once gave life.

And what about the health of the residents? The pollution generated from the construction trucks and HGVs for a decade, in addition to the 2,000 more cars from the new residents, which will significantly add to the pollution footprint of the area. In May 2018, the World Health Organisation cited Medway (Gillingham) as being the 4<sup>th</sup> worst town in the country for air pollution. That places us 16 places above London. Medway Council's 2018 Air Quality Status report cited "The main source of air pollution in the district is road

traffic emissions from major roads, including the M2 and A2” It goes on to say that “Medway suffers from significant congestion”. The report concludes by saying “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”.

But how can we quantify the damage that this development would cause to our planet? Well according to the Climate Change Committee, who advise the UK Government, the BSHF and the Empty Homes Agency, the construction of, and subsequent 50 years of life living in, 1250 brick built homes will generate emissions equivalent to 332,500 tonnes of Carbon Dioxide.

We absolutely recognise that housing developments will impact the environment and that social housing is needed in Medway but the level of harm to the ecosystems, character and appearance of the local environment and the harm it does to our health must be balanced against the social and economic benefits of the development.

And the truth is, that against the backdrop of the Medway Local Plan, which we’re assured by Medway Council will meet the governments overestimated full local housing need, a 1250 home housing development that will permanently impact the environment, creates 50 hectares of concrete, worsens air quality, impacts Sites of Special Scientific Interest and RAMSAR zones, of which there are only 73 in the whole of the UK, reduces our ability to provide UK grown fruit to our own citizens and those that we trade with, permanently prevents Lower Rainham residents from having the future security, that would come from being able to grow any kind of produce themselves, on this site, would provide little to no benefit to local residents, and it must be seen simply as a financially profiteering application, and no more.

AC Goatham & Son are the custodian of this land, land which has existed as fertile agricultural land since at least 1869 and land which is more valuable to our national security than the £189 million this land will be worth if planning permission is granted and more than the estimated £500 million that the properties on this site would generate in income. Put simply this is about turning our precious soil into bank notes and nothing more.

In summary, there is always scope to build houses and meet local housing needs on sites that are far better suited to development and where the impact will not be as disastrous and long lasting. Such sites may require more innovative thinking or result in lower profit margins but at a time where climate change and mental well-being is very much at the forefront of society, surely such options are the better way to go – better for individuals, better for the heritage of a town and better for the planet as a whole.

We would like to end by sharing with you a video which we created to try and capture the emotion, the passion and ludicrously of this application. Thank you for your time and consideration.

## **Health & Community (IIa)**

Thank you Paul

I’d now like to talk about the negative impact that this development will have upon physical and mental health and well-being, and on healthcare services within the area. And I want to share with you the reality of what this would truly mean for local residents.

Documentation submitted by the Appellant during the outline planning stage stated that they assumed there would be a population increase of 3,100 persons resulting from this development. This would take the local population to just over 24,000, all of whom would need a local GP surgery, of which there are currently only 10.

Now, if we assume that those 3,100 new residents spread themselves evenly across the 10 surgeries in the area - which of course would not be the case - each surgery in the area would have just over 2,400 patients, which is considerably larger than the 1,800 capacity set out by the NHS. Time and time again residents in the area have told us that they struggle to get a GP appointment within a reasonable timeframe because surgeries are so heavily oversubscribed, and that’s before the inclusion of this development.

*Plus, we've tested this. The Appellant's documentation stated that of 6 surgeries they canvassed, 5 were accepting new patients. Yet when we called the exact same surgeries, only 1 confirmed they were accepting new patients and another one stated that the surgery might be closing due to a retirement.*

*Now the Appellant has offered to build a health centre, yet this is planned to be at the end of the build phase which is a decade away! And of course, a building **allocated** as a health clinic is not the same as having a health clinic with medical staff, who are **immediately** ready and able to serve a rapidly growing community.*

*I'd now like to turn your attention to Medway Hospital. Anyone who lives in this area knows how much we desperately need another hospital. Medway Hospital is literally at breaking point and has been for years. Back in 2017 it came out of special measures, after four long years. Since then it has failed to meet national targets every single year and one irrefutable reason for this is that occupancy is over, or very near capacity at all times.*

*To evidence this, for the two years spanning 2018-2020, the Hospital's Annual Reports noted that they did not achieve the national standard for the four-hour performance target, finishing on just 81%. To quote the Chief Executive of Medway NHS Trust, who said: "The challenges in delivery of the emergency care access standard are strongly linked to the >100% bed occupancy"*

*Furthermore, in April 2020 the Care Quality Commission gave Medway Hospital a "Requires Improvement" Rating and, once again, "very high occupancy rates" was cited.*

*It's clear that the people who live in this community suffer first-hand the ill-effects of failing healthcare service, which can no longer provide the care it should, due to a growing and aging population.*

*Finally, I would like to highlight the importance of a community's surroundings with regards to mental well-being. The proposed development site is one of the few green buffers left between the towns of Rainham and Gillingham and its development from apple orchards into a housing estate would significantly change the landscape of the local area; thus impacting upon Rainham's agricultural heritage and residents' sense of place within the Medway Towns as a whole.*

*Now, the Appellant has argued (and I quote) that the development will "open up green spaces and provide new planting and landscaping on a site that is currently private commercial land." Yet, prior to the community fighting back against this development, residents had walked freely through the orchards for many decades without any objection from the landowner. We feel it is worth noting that a Public Right of Way Application is currently being considered by Medway Council and we urge the Inspectorate to take this into account when making their decision.*

*Furthermore, whether or not public access is permitted to the site, the orchards are very much visible and form part of the rural landscape of Lower Rainham. This landscape, as it stands, is significantly important for mental well-being as it provides a brief escapism from the urban landscape of the town, which has grown significantly over recent years.*

*For all of these reasons, we feel that the Appellant's application should be refused.*