



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

BY EMAIL ONLY

Dear Sir/Madam,

Re: Future Hoo Consultation 2021: Second Round

Thank you for providing Kent County Council (KCC) with the opportunity to comment on the "Future Hoo Consultation 2021: Second Round".

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

Highways and Transportation

Chapter 3: Road

The County Council, as Local Highway Authority, notes that the consultation booklet does not provide traffic information to assess the impact on the Kent highway network. KCC would therefore welcome further engagement on this matter. It is noted that separate engagement is taking place on the Medway Local Plan.

Pages 40-57

Whilst KCC recognises that the proposals aim to provide vehicle connections to new development areas and relieve congestion, there is concern that they lack provision and priority for active and sustainable modes of transport and that no overall strategy has been presented. Footways and some cycle routes have been proposed alongside the key highway routes; however, they do not appear to have been prioritised and in certain places appear to terminate before reaching a destination (for instance, as shown on Figure 23). Furthermore, there is a lack of proposed highway verges and trees to enhance the routes and make them attractive corridors for active travel, and indeed to support biodiversity and pollinator 'beelines'.

Growth and Communities

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18 January 2022

To ensure that congestion is reduced, KCC recommends that consideration is given to providing bus lanes, which could encourage uptake of this mode and reduce the number of vehicles on the network. The provision of the new railway station at Hoo will be a driver in changing the modal shift, where walking, cycling and public transport should be prioritised.

A modal shift towards sustainable transport for new and existing residents would reduce the traffic related impact on both the Medway and Kent networks.

KCC would request that consideration is given to the proposed Blue Bell Hill junction improvements and the potential for contributions towards this highway scheme.

Transport Policy

Page 7 – What happens next?

The consultation booklet states that Medway Council aims “to have all elements contained in the Housing Infrastructure Fund (HIF) proposals in place by March 2025” (page 7). KCC notes that if Lower Thames Crossing was to be successful in securing a Development Consent Order, then construction would be anticipated to start in 2024. Therefore, the overlap of construction needs to be carefully managed to ensure disruption is minimised and all cumulative impacts are mitigated. This may also include the London Resort where appropriate. This Resort development will not only have an impact on the highway and environment, but also in terms of demand for construction workers, for example.

The consultation booklet also does not reference Lower Thames Crossing. KCC would recommend the importance of collaboration between National Highways’ Lower Thames Crossing team and Medway Council’s HIF team to ensure sustainable growth in the area. It is clear from the [Consultation Report](#) from the first round of consultation that suggestions were made about how the new roads would link to the Lower Thames Crossing; however, there is a lack of clarity included within the latest consultation booklet.

KCC also requests that further clarification is provided as to whether the improvement proposals for the A228 and A289 also take into account the impact of the Lower Thames Crossing and provide appropriate mitigation.

Chapter 2: Rail

Page 34 - Service provision

The County Council notes that whilst the first consultation stated an aspiration for a half hourly service on the new passenger service line to Sharnal Street, this aspiration is not mentioned in the second-round consultation documents. It is assumed that the ambition remains however and hence, KCC’s comments are based on this assumption.

Option One - Link service between Sharnal Street and Gravesend

It is understood that prior to the pandemic, in the peak periods, Gravesend Station saw over eight trains per hour travelling London-bound. At present, the station continues to receive a similar level of peak service. KCC is concerned that, given that services from Sharnal Street would ideally terminate at the London-bound through-platform in the morning and Kent-bound through-platform in the afternoon, there is the risk that either substantial changes may be needed to the timetable to accommodate terminating services (which may lead to uneven headways for services across wider Kent) or that performance risk is introduced with potential delays to both London-bound and Kent-bound services. This would be due to reoccupation times for platforms and the delay caused awaiting points-crossing moves for the Sharnal Street service to the east of the station.

KCC understands that upgrading the cross-over would add flexibility to the terminating platform option, however it may also add to station congestion if the arrangement described above did not operate. KCC would therefore request that assurance is provided on this matter.

It is presumed that given the proximity of the points to the east of Gravesend station, a Kent-bound train is unable to route to platform at Gravesend until the crossing-move has completed. KCC would welcome clarification on this matter.

The County Council would request confirmation, and the provision of suitable evidence where appropriate, from Network Rail and the train operator, via Medway Council.

KCC also requests that further consideration is given to terminating services at Sharnal Street and their impact on station congestion. It is assumed that the predominant demand flow is London-bound and so terminating at the London-bound platform eases interchange for London-bound services. Furthermore, there is likely to be a preference for High-Speed services from the Medway Valley or the north Kent coast. On this basis, KCC requests that if this option is progressed, it is carried out based on prioritising Sharnal Street services to terminate ahead of the next arriving train at the London-bound platform, to avoid accumulation of passengers on the platform at Gravesend.

KCC would also ask for clarification on the work undertaken to date (or planned to be undertaken) regarding ensuring that passenger flows and interchanging passengers via the overbridge at Gravesend are forecast to be safe, acceptable and avoid generating unacceptable levels of congestion.

Option Two - Link service between Sharnal Street, Gravesend and Northfleet

KCC, Gravesham Borough Council, Dartford Borough Council and Ebbsfleet Development Corporation submitted a [Strategic Outline Business Case](#) for the extension of Crossrail from Abbey Wood to Northfleet / Ebbsfleet in October 2021. As part of this proposal, outline design work and optioneering highlighted a need for

operating Crossrail services to, and terminating at, Northfleet, with this service forming part of the preferred option within the Strategic Outline Business Case.

It is noted that there are longstanding proposals for development of a fixed link interchange between Northfleet station and Ebbsfleet International station. KCC supports these proposals and wishes to ensure that they are delivered, or at least active provision is made as the Ebbsfleet Garden City is built out, to maximise the ease of accessing High Speed and potential international rail services from the north Kent rail corridor.

Overall, KCC considers that the Future Hoo proposals would benefit from an extension of Crossrail services to Northfleet, given that it would provide easier access to this alternative direct link across the heart of London's west end, city and docklands districts and on to Heathrow Airport.

The County Council therefore requests that:

- Any design work for the option of terminating at Northfleet takes account of the existing Crossrail safeguarding, demonstrating assurances from Crossrail Ltd (or TfL as necessary) that the safeguarding has been considered.
- Any design work for a new terminating platform at Northfleet includes options to consider passive provision for a terminating platform for Crossrail services or additional extended National Rail services east of Dartford. KCC would highlight the benefit of Medway Council and their rail partners on the Future Hoo proposals engaging with the Crossrail to Ebbsfleet (C2E) to support the consideration of such proposals. In the first instance, this would include agreeing to a scope of work to take the Crossrail extension proposals into consideration, prior to then agreeing how this can be funded as part of the Future Hoo rail proposals design work.
- The first point additionally concerns the fixed/non-fixed link interchange proposal between Northfleet and Ebbsfleet International stations.

Based on the platform option plan shown in Figure 15 in the consultation document, option three to the west of the existing station appears least optimal, as it would generate a station with a layout that is likely to be less user-friendly and complicates the station.

Option Three - Link service between Sharnal Street, Gravesend and Ebbsfleet

Overall, the County Council anticipates that the costs of this option are likely to prove prohibitive. However, the County Council raises no objection to this proposal, provided that the service delivered would not impede and cause unreliability or reduce capacity on the High Speed 1 (HS1) domestic services across the county of Kent. Consequently, KCC requests further information from Medway Council as to how this option will be developed with appropriate input from HS1 Ltd, Network Rail Ltd and the train operator.

Public Rights of Way (PRoW) and Access Service

The County Council is committed to working in partnership with Medway Council to achieve the aims contained within the [KCC Rights of Way Improvement Plan](#) (ROWIP) and the [Medway Rights of Way Improvement Plan](#) (Medway ROWIP), to provide a high-quality PRoW network, which will support the Kent and Medway economy, provide sustainable travel choices, encourage active lifestyles and contribute to making Kent and Medway a great place to live, work and visit.

KCC welcomes the intentions for improvement and enhancement to the PRoW network and all pedestrian, cyclist and equestrian infrastructure, which provides significant opportunities for outdoor recreation and active travel across the region. It is therefore imperative that the Hoo Peninsula Improvement Scheme does not deter use of these paths through detrimental noise, air quality, drainage or landscape impacts. KCC notes that where modifications to existing path alignments are required to enable the developments to proceed, that appropriate diversion routes should be discussed with the appropriate PRoW and Access Service (either Kent or Medway) in advance and processed using the relevant legislation procedures.

Chapter 1: Strategic Environmental Management Scheme

Page 14 - Phase 1 Cockham Wood Community Parkland

KCC supports the objectives of the Medway ROWIP and the intention to create new links to connect the PRoW network, as shown in Figure 1 and the text.

Page 16 - Phase 2a Hoo Flats Community Parkland

KCC supports the new links to the existing network and particularly agrees with the response regarding the connectivity of routes and circular routes.

Page 18 - Phase 2b Lodge Hill Community Parkland

It is presumed that all proposed furniture and routes must be completed with the approval of Medway PRoW Service.

Page 21 - Phase 2d Shared use bridge for people

KCC supports the essential connection between the proposed Community Parkland sites for all users - pedestrian, cycle and equestrian.

Chapter 2: Rail

KCC recommends that continued involvement with Medway PRoW Service is carried out to ensure that user safety is a priority at all crossings and access points. It is essential that pedestrian and cycle network connectivity is improved and not fragmented.

KCC highlights that the Kings Crossing PRoW NS139, NS140 and the area of Registered Common Land as shown in Figure 8 and text all come under the authority of KCC PRoW and Access Service. It is therefore essential that KCC is fully consulted throughout this process. All other crossings are within Medway PRoW Service.

Chapter 3: Road

KCC notes that all PRoW matters within this section fall under the authority of Medway PRoW Service.

With reference to the National Planning Policy Framework (NPPF) and National Policy Statement for National Networks (NPSNN), KCC highlights that this project provides an opportunity to improve the existing PRoW network and develop new links for active travel and outdoor recreation. The creation of new paths and upgrading of existing routes should be considered as positive outcomes of the scheme. The public benefits of such work would compensate for the disruption caused by temporary network closures and potentially offset the loss of any permanent path extinguishments or diversions, which are required to facilitate the delivery of the Peninsula Improvement Scheme.

KCC would draw attention to the County Council's Countryside and Coastal Access Improvement Plan which, together with Medway Council's ROWIP, highlights the lack of existing off-road equestrian access provision in this region. The Peninsula Improvement Scheme therefore provides an opportunity to address this issue, as new routes with higher user rights could be created within the development areas. KCC recommends that the potential for establishing new equestrian provision and cycle routes as safe alternatives to existing on-road routes should therefore be explored.

Overall, KCC PRoW would welcome the intentions of the scheme's proposed connectivity and green infrastructure. However, there are some further general comments to be made:

KCC recommends that consideration is given to the wider environment i.e., the impact on the County of Kent. It is noted that a new rail station with links to London, transport links to highway networks including the proposed Lower Thames Crossing, together with 12,000 new homes, stated in [Planning for Growth on the Hoo Peninsula](#), will increase pressure on all networks. The Hoo Peninsula improvements would be expected to have a significant impact on these networks, as residents seek opportunities for outdoor recreation and leisure in the countryside.

Furthermore, the increased population will add to the pressure and importance of the PRoW network surrounding the Peninsula. It is therefore critical that consideration is given to these highly regarded links, to ensure they are not degraded. Considering the likely increase in use, opportunities should be taken to make significant

improvements to the existing PRoW, as they will increasingly serve as sustainable transport links and provide opportunities for recreation and employment.

Considering the scale of this project and the wide range of Non Motorised Users who will be affected, it may be beneficial to establish an overarching access strategy. This would ensure there is a 'joined up' approach for delivering an action plan that would benefit all path users.

Heritage Conservation

KCC is concerned that the consultation document does not currently reflect the significance of the historic environment of Hoo, nor the likely impact of the proposals. The document has the objective of describing the environmental management measures to be employed during the rollout of the scheme, however no detail is presented for what measures will be taken to conserve or enhance the heritage affected. This is in contrast to the detailed information presented regarding the natural environment and landscape, which contains firm commitments to improvement measures. KCC acknowledges that the natural environment and biodiversity of Hoo are better known than the archaeological heritage, and that there are stronger designations for the natural environment in the area than for the historic environment. In part, however, this is due to a lack of study in the area and, in addition to known designations, there is still the possibility of discovering further archaeological remains of great significance. 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 therefore 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 impacted negatively, and so that the heritage landscape that they comprise does not become fragmented.

KCC notes that the text separates the historic environment from other environmental aspects. It should be understood that the natural, built and historic environment are all complementary and that treating them as separate entities is likely to fail to maximise potential benefits, as well as increase the possibilities of problems arising from a lack of joined-up thinking at an early stage.

KCC is also concerned that the document implies that the range of possible environmental actions has already been identified and will focus on access improvements, localised biodiversity and natural environment improvements. KCC suggests that there are other actions which could be undertaken to support the environmental health of the area and the ability of residents to enjoy it. These could 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. KCC highlights that many of the proposals in the document, and in the growth that is to come in Hoo, will impact on archaeological remains. These remains constitute a key component in the historic environment of the district being tangible survivals of Medway's heritage and thus are irreplaceable. The National Planning Policy Framework fully recognises the importance of this resource, which states that:

'199. Local planning authorities should require developers to record and advance understanding of the significance of any heritage assets to be lost (wholly or in part) in a manner proportionate to their importance and the impact, and to make this evidence (and any archive generated) publicly accessible. However, the ability to record evidence of our past should not be a factor in deciding whether such loss should be permitted. Copies of evidence should be deposited with the relevant historic environment record, and any archives with a local museum or other public depository. '

After the archaeological work is completed, an archaeological 'archive' is created, which is 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.

KCC highlights the need for archaeological storage for these materials, with proper education and access facilities, which is critical for the proper exploitation of the heritage of Medway. This need is created almost entirely by development and represents a significant infrastructure requirement that is generated by developers 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, as appropriate. This will not provide for the initial setup cost, however, nor the facilities for community use, and it is these elements that might be appropriate for inclusion in requests for developer contributions. KCC urges that Medway Council considers the provision of archiving facilities as an appropriate use of HIF environmental mitigation funds.

Page 8 – Strategic Environmental Management Scheme

KCC notes that the Strategic Environmental Management Scheme proposals described do not integrate a wide range of environmental variables to deliver environmental improvements. The intention is perceived to be focused on biodiversity and landscape but not to include the historic environment which should be an integral component of a healthy environment. KCC emphasises that there is potential here 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 19th and 20th 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, could have negative impacts on heritage assets and it is not clear how these impacts

would be identified, assessed and mitigated if heritage is not included in the Strategic Environmental Management Scheme. KCC notes that it would be preferable if all aspects of the environment can participate in the Strategic Environmental Management Scheme proposals so that they can complement one another.

Page 14 - Phase 1 Cockham Community Parkland

As an example of what could have been achieved, and might yet, if the Strategic Environmental Management Scheme scope can be expanded - a planning application has recently been submitted for a new community parkland at Cockham Wood (which forms Phase 1 of the Strategic Environmental Management Scheme work and is the example discussed in the consultation document). However, 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, 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.

Page 16 - Phase 2a Hoo Flats Community Parkland

The site proposed for the parkland has potential to contain archaeological remains of all periods and the relative lack of discoveries from early periods within the site itself is arguably primarily due to the lack of investigation. In the wider area, however, there has been much investigation and finds, suggesting that there is good potential for earlier remains to exist within the site. Natural erosion along the section of the Hoo Flats foreshore west of Buttercrook Wharf has revealed several finds of archaeological interest, which include exposures of peat deposits of uncertain date. Peat deposits elsewhere along the Medway have been demonstrated to range from the Mesolithic, through to Bronze / Iron Age, as well as being a result of medieval development. These peat deposits are likely to preserve palaeo-environmental evidence and may also preserve other organic archaeological remains which would not ordinarily survive. An example is the reported observation of a brushwood trackway observed on the foreshore here.

Other finds from this section of foreshore include Neolithic and Bronze Age worked flints, Roman pottery and Romano-British burials. It is understood from other nearby sites that the Medway was the focus for various industrial activities in the later Prehistoric and Romano-British period, including for the production of salt and the manufacture of pottery. Archaeological excavations to the west have revealed evidence for Bronze Age and Romano-British date, whilst recent archaeological work at Kingsnorth Quarry immediately north/north-east of the proposed parkland has revealed extensive evidence of Later Bronze Age activity and occupation, perhaps relating to salt production immediately to the north. KCC notes that the creation of wetland habitats (including through ground reprofiling and waterlogging areas) could have a substantial archaeological impact and/or make archaeological remains inaccessible for future study.

However, there are a number of known heritage assets within the proposed parkland that have the potential to be impacted by the proposals. Many are extant historic landscape features within the area, particularly relating to historic sea defences. For example, a possible medieval moated site lies south of Abbots Court in the north-east part of the site. Additionally, the site marks the southern end of the Second World War GHQ Stop Line in the Hoo Peninsula. The line as a whole is a well-preserved example of this type of defence, which is part of a major chapter in the national story. The southern end of the Stop Line where it meets the Medway is particularly well-preserved. The surviving remains are a coherent group that can be readily understood and linked to the natural topography. The local topography of the Stop Line is important to understanding why the various parts of the stop-line are so positioned and how the scheme as a whole functioned. As such, the setting of the stop-line (which includes surviving physical and buried archaeological elements) is an important part of its significance and KCC emphasises that even if physical changes to the stop-line are not proposed, changes to its setting could be harmful, for example, if previously dry land is made wet.

Elements of the stop-line are designated as listed buildings, primarily pill-boxes and other hardened-works at the southern end of the line. This requires placing a duty on the Local Planning Authority to pay special regard to the desirability of preserving the setting of the listed structures, under Section 66 of the Planning (Listed Buildings and Conservation Areas) Act 1990. It is therefore essential to understand how the introduction of new areas of wetland will alter the setting of the stop-line. Although the creation of a new parkland has the potential to allow greater visibility of the heritage, particularly if accompanied by the interpretation indicated in the text, the structures could also be negatively impacted by works associated with the proposed parkland. In particular, the hydrological changes described in the text can impact heavily on both buried and standing archaeology. KCC strongly recommends that a full assessment of the impact of the proposals on these heritage assets should be carried out before proceeding with the proposals.

Page 18 - Phase 2b – Lodge Hill Community Parkland

The proposed Lodge Hill parkland contains an extensive military landscape associated with both World Wars and has remains from earlier periods.

Archaeological investigation in 2011 found a later prehistoric agricultural settlement dating primarily to the late bronze age / early iron age. This was located in the area immediately adjacent to the lodge Hill Magazine Establishment and south of Lodge Hill Wood. Close to Lodge Hill Camp, Roman finds were discovered that suggested a structure in the vicinity and other iron age and Roman finds have been recovered within the site boundary. KCC notes that there is potential for other archaeological sites to be located within the site boundary, particularly given the prominence of the site overlooking the Medway and this needs to be formally assessed prior to any proposals being formalised.

The most visible heritage assets within the parkland boundary relate to the past military role of the site. Although there may be features related to the Lodge Hill

Magazine Establishment to the south, it is likely that most of these will derive from the two World Wars. The most significant asset is the Lodge Hill anti-aircraft battery, which is believed to be the oldest surviving battery in the country, and possibly the world. The parkland project provides an opportunity to secure the future of this site through a scheduled monument and could represent a significant enhancement of the area's heritage if accompanied by appropriate conservation and interpretation. However, KCC notes that greater public access could potentially result in harm to the structure. There are a number of other First World War features in the area including military trenches and redoubts and buildings related to the anti-aircraft battery. During the Second World War the GHQ Stop Line passed north-south just east of the magazine establishment and then westward through Wybornes Wood, Lodge Hill Wood and Rough Shaw. At least eighteen pillboxes are recorded within the parkland site, as well as anti-tank ditches, trenches, earthworks, a decontamination centre, air-raid shelter, the Naval Tramway and other features. It therefore constitutes a nationally important military landscape and it is essential that its significance is not reduced by works associated with the proposed parkland. Instead, KCC highlights that its significance can be enhanced and developed by careful interpretation and conservation to become a valuable community asset. These earthwork and buried remains are potentially vulnerable to damage from even relatively light-touch works, such as tree planting and vegetation clearance, if they are not adequately understood. KCC strongly advises that a full assessment of the landscape, its heritage and the likely impact of the parkland proposals should be carried out at an early stage.

Page 20 - Phase 2c – Deangate Ridge Community Parkland

The Deangate parkland site lies just below the ridge that forms the main spine of the Hoo Peninsula. Past archaeological investigations in the area have been limited however those that have been undertaken recently suggest a pattern of prehistoric and Romano-British agrarian land-use interspersed with small settlements and areas of small-scale industrial activity. The alignment of a Roman road linking the Hoo Peninsula to Roman Watling Street is projected to run to the south of the former Chattenden Barracks close to the application site. Archaeological works during the construction of the A249 have also identified field-systems and possible settlement activity aligned on this route. Only more recent sites are known from within the parkland site itself, such as a historic farmstead stood at Deangate. Additionally, the Lodge Hill magazine establishment adjoins the site to the north and the Second World War GHQ Stop Line passed through the eastern end of the site. It is highlighted that the main heritage asset in the parkland site is the Second World War Deangate Ridge Radar Station. The site has not been examined in detail, however it seems likely that extensive archaeological remains will survive. KCC notes that the remains could be negatively impacted by the planting proposed for the site, however if conserved and interpreted, the radar station could become a significant focus for the parkland and a valuable community asset.

Chapter 2: Rail

Page 26 – The Station

Regarding the barn style Sharnal Street Station, KCC recommends that consideration is given to the crop and soil-marks which have been identified in fields alongside Roper's Lane and have been interpreted as perhaps representing a Romano-British enclosed settlement. KCC notes that the site also has potential to contain Pleistocene deposits and associated Palaeolithic artefacts and faunal remains.

Page 28 – Level Crossings

Kings Crossing and Church Street Crossing

KCC notes that the Church Street Conservation Area lies to south and includes the Grade 1 listed church and other historic and/or listed buildings. It is also close to the scheduled monument site of St Mary's Priory and its associated Abbey Farm. Evidence for Anglo-Saxon activity has been recorded within the village and that there is potential for gravel and potentially fluvial deposits of Pleistocene interest.

Page 30 - Wybournes Farm Crossing and High Halstow Restricted Byway

Wybournes is a Grade II listed farmhouse and sits within its associated historic farmstead. KCC notes that High Halstow Halt and its associated sidings are also of heritage interest and additionally there is moderate potential for deposits of Pleistocene interest.

Page 31 - Solomon's Crossing

There is moderate potential for deposits of Pleistocene interest at this site.

Page 32 - Hoo Junction to Cliffe Loop

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. KCC comments for Church Street Crossing also apply here. At Cliffe Junction, the railway passes through an Anglo-Saxon cemetery and Roman finds near Buckland Farm and through the Second World War GHQ Stop Line.

Page 33 - Cooling Street 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. KCC notes that chance finds of Romano-British coins and Anglo-Saxon metalwork have also been made in the area and that 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.

Chapter 3: Road

Page 40 - Phase 1

KCC notes that the Phase 1 area has a theoretically high potential for Pleistocene (fluvial terrace) deposits and associated Palaeolithic artefacts and faunal remains, which could be of high significance. A Late Bronze Age funerary urn was found in 1918 during the digging of military practice trenches between Chattenden Barracks and Islingham Farm. Islingham (now Islingham Farm) acted as an estate centre in the medieval period and a late eleventh century chapel is recorded within the manor there. Extensive First World War military practice trenches are shown on historic aerial photographs north and south of Woodfield Way.

Page 45 - Phase 2 - New Relief Road and associated spur link

KCC notes that the Phase 2 section between Upchat Roundabout and Chattenden Lane is of particular significance for its military heritage as it passes through the former Chattenden Barracks site. The barracks provided accommodation for the soldiers guarding the nearby magazine. There remains the potential for the discovery of archaeological remains associated with the military use of the site, including the buried remains of the now demolished late nineteenth century barracks, the military railway line that connected Chattenden and Upnor, and an Armament Depot. In addition, there is some potential for presently unmapped gravel terrace deposits (Anglian or pre-Anglian) and late Bronze Age/early Iron Age activity previously recorded within former barracks site. Nearby, extensive Roman and Anglo-Saxon evidence has been discovered, at Four Elms and within Chattenden village, demonstrating the general archaeological potential of the area.

In the section east of Chattenden Lane Mesolithic, remains have been found at the Abbey Homes development. In addition, a second World War radar station existed at Deangate and wartime aerial photographs show it was accompanied by possible gun emplacements, storage areas, military support buildings and access roads.

Page 51 - Phase 3 - Improvements to A228 Bell's Lane Roundabout and Dux Court Road

The Phase 3 area is located at the point where the existing road network intersects with the Second World War GHQ Stop Line, which was a key part of the anti-invasion strategy developed in the immediate aftermath of the Dunkirk evacuation. It was made up of an anti-tank ditch with pillboxes. The Stop Line was assessed as part of the Historic England Hoo Landscape Project and is considered to be a highly significant heritage landscape. Some pillboxes have been designated as Listed Buildings, including examples nearby along Bells Lane. Anti-tank pillboxes have also been recorded adjacent to Dux Court Road and Peninsula Way, with a Royal Observer Corps Monitoring Post adjacent to the latter.

Page 52 - Phase 4 - Improvements to Ropers Lane Roundabout and modifications to the existing highway network to facilitate access to the new station

Crop and soil-marks have been identified in fields alongside Roper's Lane and have been interpreted as perhaps representing a Romano-British enclosed settlement. KCC notes that the site also has potential to contain Pleistocene deposits and associated Palaeolithic artefacts and faunal remains.

Page 54 - Phase 5 - Four Elms Roundabout

Multi-period archaeological remains have been recorded at the Four Elms Roundabout. This includes Mesolithic or Neolithic pits, Late Bronze Age activity, a Romano-British enclosure including a stone-built structure (interpreted as a corn-drier or malting oven), an Anglo-Saxon settlement with substantial post-built hall and other sunken featured buildings. The site also has a high potential for Pleistocene (fluvial terrace) deposits and associated Palaeolithic artefacts and faunal remains.

Page 56 – Phase 6: Wulfere Way and Sans Pareil Roundabout

KCC comments for Phase 5 also apply here. In addition, though, there is a possible ring-ditch on the south side of Wulfere Way, as well as Beaker / Bronze Age activity to the north. Further evidence for Anglo-Saxon settlement has been found adjacent to Wulfere Way and Romano-British activity has recently been identified close to Sans Pareil Roundabout. KCC notes that the site also has high potential for Pleistocene (fluvial terrace) deposits and associated Palaeolithic artefacts and faunal remains.

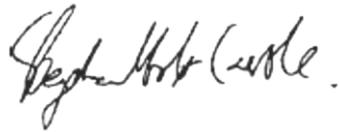
Page 59 - Environmental Assessments

KCC is concerned that the environmental issues of the area's heritage are not addressed within the Environmental Impact Assessments and Environmental Statements to be developed during the project. The text describes the various surveys and studies that have been carried out to inform decision-making for biodiversity, however no similar studies seem to have been carried out for heritage. In reality, all the Phase areas contain significant archaeological monuments and have potential for the discovery of as yet unknown sites, and thus KCC requires a comprehensive historic environment study to inform the proposals.

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,

A handwritten signature in black ink, appearing to read "Stephanie Holt-Castle". The signature is written in a cursive style with a period at the end.

Stephanie Holt-Castle
Director – Growth and Communities