

STOKE PARISH COUNCIL



50 Pepys Way, Strood, Rochester, Kent, ME2 3LL

Clerk: Mrs J Allen
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Amanda Barnes,
Medway Planning Office,
Gun Wharf, Dock Road,
Chatham,
Kent,
ME4 4TR.

Friday 10th March 2023,

Dear Ms Barnes,

RE: MC/23/0106 – Land At Middle Stoke Including 1 & 2 Jubilee Cottages Grain Road Middle Stoke Medway ME3 9RS.

The members of Stoke Parish Council wish to object to the above stated planning application based on the following grounds of health and safety, social impact and technical non-compliance matters.

1. Safety

- a.** The low sewage network for Middle Stoke is a pumped system. The pipe from the new site would be gravity fed down to the local pump house and extracted to the Stoke waste treatment plant. This system is regularly overwhelmed by rainwater, causing system breakdowns and raw sewage to be spread across the open road. This has been recorded with Medway Council repeatedly over the last 10 years and is a known public health hazard. The addition of seven properties and the replacement of two small existing properties, would result in an additional 141 litres of water per person per day being added to the waste discharge and sent to the local pump house. The present system does not have spare capacity to support this development and as such it would only add to the existing public health issues in Middle Stoke.
- b.** The entrance to the new site is located on A228 Grain Road and is exited via a narrow, one-way street, to the west end of the village. This junction has limited visibility and is a known hazard point which has resulted in a speed trap being placed next to it, to reduce the risk of incidents. With an average of 33 residents expected to be housed within the new site, this would greatly increase the use of this junction. The site proposal for this application does not mention these issues or any mitigation to reduce the impact the increase in habitants would bring; as such any submitted traffic plans should be dismissed as unsuitable for this location until this is included.
- c.** The public amenities in Stoke are located approximately 500 metres away in Lower Stoke and are accessible only via foot paths, crossing the busy A228, or by car. The increase in 33 residents to a small village would greatly increase the use of this route. The A228/Grain Road that divides Middle and Lower Stoke is continuously used lots of traffic, including heavy goods vehicles accessing Grain Port and the surrounding industrial area farming machinery and the everyday traffic for both the villages of Stoke and Grain by local residents. This proposal has not provided any measures to improve the safe use of this

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crossing, or the ability for local parish amenities to absorb the increased population uplift; as such any assessment of the safe use of the proposed site should be dismissed until this has been undertaken.

d. The area to the north east of the site is currently classed as moderately high risk for ground subsidence. With the existence of a high pressure main under the site, and the requirements to move heavy plants around to conduct excavations, it is felt that this area should be classed as a high-risk. As such we would like to see a report conducted in line with SGN/WI/PS/6 and audited by an approved SGN assessor to ensure that any risk of explosion from working around the gas main had been mitigated prior to any planning application being agreed, in order to guarantee the safety of our residents and buildings.

2. Social

a. The parish no longer has a GP practice and owing to this, residents have no choice but to use the nearest doctor's surgery, located in Hoo. This practice is oversubscribed and we understand they are not able to take on any patients. As such any new residents would need to seek medical attention off of the Peninsula or have the medical care team visit them in their homes. Due to the site access road being flooded during heavy periods of rain, the ability for the emergency services to access the new site will be limited in these periods, increasing the risk to life. This is already an issue for Middle Stoke residents and has not been highlighted within this proposal.

b. Stoke Parish also has no schooling facilities. Students are therefore required to attend the Allhallows Primary Academy and the Hundred of Hoo Secondary School to meet its educational needs. The submission refers to the limited bus services in place for both schools, were pick up and drop off points are located over 500 meters away from the site entrance. This will therefore require children to cross the A228 / Grain Road at heavy traffic periods. Additionally, we understand that the Allhallows school bus service is also only running on a temporary 5-year agreement and the Hundred of Hoo Secondary School bus is periodically cancelled, owing to breakdowns and the recent spells of bad weather. The here by stated issues will cause an increased need to drive the children to school from this new housing development. It was noted that these issues have not raised in the proposal and we feel that they should also be considered within this application.

c. Middle Stoke is a small rural village with limited parking and tight access; any construction work would greatly impact the access to this area and the use of the village itself. The increment of heavy goods traffic during the preparation and construction of these dwellings has not been raised and should be highlighted as an increase in street parking within Middle Stoke. With this increase in traffic there would be a greater risk of obstruction for emergency service vehicles responding to SOS calls from residents and to the airfield, which is located along Burrows Lane in Middle Stoke.

d. Street parking within Middle Stoke, as identified above, is limited at best. The proposal to only proportion two parking spaces per property is poor forward planning. The village does not have the capacity to accommodate an extra 13 cars, not including visitors. Stoke Village has no direct public transport routes and as such this does not fit in which the national strategy to reduce the need of cars in

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rural areas, alongside overloading a rural village with vehicles and restricting public and emergency access.

e. With a high likelihood of parking from this development overwhelming Middle Stoke during the site construction, it is predicted that traffic will overflow from the development and impact Lower Stoke. The residential areas across Stoke are already overcapacity and would not be able to assist in taking this increase in parking. Parking could therefore move onto the kerb of the A228 / Grain Road, creating a higher risk of accidents and collisions on a heavily used road. This outcome could result in a death and it is apparently that this has not been considered within any of submitted proposals. Until the issue of parking is addressed or other provisions for transport are incorporated into this proposal, we feel it should be rejected as a risk to life.

f. There is no of public transport serving Middle Stoke, with the nearest bus stop over 500 meters from the proposed site access, not under 500 meters as stated within the transport assessment. As such this element of the assessment should be discounted, due to an inaccuracy of the assessment of the sites.

g. The only access to Middle Stoke for cyclists is via the A228 / Grain Road, which is a heavily used single carriageway. It is not a safe route for cyclists to use. The road is regularly damaged by the heavy goods vehicles and farming machinery that use this route and as such we feel that the surface itself is unfit for cyclists to travel along, especially in darker periods of the day and or year. A large number of incidents have been recorded with cyclists on this route and as such the site should be assessed as unsuitable for safe cycle access.

h. The two buildings identified for demolition are of heritage value, they are in fact the two oldest buildings in the village. Little consideration has been given to retain their use or the carbon impact their demolition and replacement will have on the environment. The sustainability assessment does not address the embodied carbon impact of this demolition, which is proven to be 10 times higher than their refurbishment. As such the sustainability assessment should be classed as unsuitable, until this element and its heritage impact has been addressed.

i. The submission report identifies that the new buildings will be sighted within a high ambient flood score rating area, that will directly impact the ability to insure the new properties and the associated construction works. To enable these properties to be adequately insured and no future works fall to the Parish or Medway Council, this element should be heavily considered within the planning application. Not only to ensure these properties have a future resale value but that they can also be safe guarded for insurance premiums.

3. Technical

a. Elements of the submission refer to the site as a brown field site, this is incorrect as only a small farm yard in the south west corner is brown field. The large majority of this site is classed as agricultural land. Any reference to the site being classed a brown field is misleading and should be removed from the application.

b. The Soil permeability and flooding impact has been incorrectly undertaken within the RSPD report; when checking the environmental agency data. The site has been identified as having a high risk of

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groundwater and a significant risk of surface water flooding from the site and the adjoining A228 / Grain Road run-off, especially when drains are blocked (which is a regular occurrence). The site soil has only been assessed based on GBS online data and a 1958 borehole from over 150m's away, where it has been incorrectly identified as 'well drained sandy/clay soil', when it is in fact London Clay soil, with a percolation rate of 0.8, which has been proven on an adjoining site.

This is well below the BRE Digestive 365 stated rates to enable percolation in soil for soakaways (or below drive drainage). Owing to this, any data within the RSPD report should be classed as inaccurate and unsuitable for use. This also discounts any use of soakaways, permeable paving or attainment that relies on percolation to reduce site surface water. It will require a maximum use of evaporation and transpiration from plantation to remove standing water. The present proposal is well undersized to enable this requirement and any surface water proposals should be dismissed until this requirement is resolved.

c. The site has been identified as a moderate to high risk of groundwater flooding, with its point of access directly adjacent and leading onto a high groundwater flooding and low surface water effected street. With the Stoke flood barrier now on a managed decline program, any addition to the low flood risk will increase the likelihood of increased flooding. This point alongside the elements raised for incorrect onsite surface water management calculations and the increase in foul water use, places this proposal as a critical hazard to the existing residents of Middle Stoke and should be refused until these points can be addressed.

d. The present site design creates a contamination risk in the area; the new pond site location has been historically used by farm machinery and chemical storage. This prior use has created a potential risk of water contamination from historic site soil contamination, increasing the possibility of water pollution and species damage with increased water percolation and surcharging in this area. Until this risk can be investigated in greater depth and the risk of forever chemicals being discharged into the water course (Stoke local marsh land already has a high forever chemical count from prior area usage), this water capture solution should be discounted.

e. The sustainability proposal refers to the creation of a wild meadow to the north edge of the site. Due to nature this site is presently rarely used for farming and is left to grow wild most years. This recommendation would therefore result in over a net loss of over two thirds of the sites present biodiversity. The site is well known to hold several wild species, with wildflowers around its edge. The site also contains local newts and barn owl populations, which are listed on national registers. The present proposal does not address these issues and as such, the extremely poor sustainability report, should be dismissed as unsuitable.

f. Alongside the above points, the wider impact on local protected bird species from increased recreational activity, in line with the Habitat Regulation Assessment Part 2 statement, should be considered. At present no avoidance and mitigation measures have been provided to reduce this impact. In line with the HRA recommendations and the submission relating to these areas, the application should be dismissed, until works have been incorporated into the proposal

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g. The site is set alongside the busy and noisy A228 / Grain Road. At present the proposal only includes placing a short distance of no more than 10 meters over a wildflower field to mitigate this noise and related air pollution. This provision is inadequate and will struggle to offset the site's own noise and air pollution. It is recommended that a in depth planting and noise barrier solution is investigated to build resilience into the site and its continued use. Until this work is undertaken it is requested that the existing mitigation measures are discounted, and a consultation is undertaken to address this area for the site and wider community.

h. The traffic assessment has only been concluded on the proposed new access location without consideration for agriculture traffic and not the interconnecting Grain Road (A228) that links Grain Port with the rest of Medway. The report highlights access to schools, the points identified in paragraph 2b of this report should be read in conjunction with this statement. As the site is located within an agricultural setting with heavily vehicle traffic passing the new access location daily from airfield and co-located factory, which is not accounted for within the submission's reports. All the UK locations stated as references within the traffic calculations are not sited against a heavily trafficked road, adjacent to the site or placed this in this type of rural location, as such they do not show parity. Given its location any assessments taken from these calculations should be discounted. This point and the other points stated, have identified that the assessments made on the traffic reports data have been incorrectly undertaken and should be classed as unsuitable for this project.

i. Alongside the lack of drainage capability for this site, there is also great concern that Stoke lacks adequate resilience and spare capacity in its local water pressure, local internet supply and long-term electrical supplies. The area regularly has power cuts due to poor local infrastructure; slow internet is repeatedly raised by Stoke residents and areas such as High Street in Lower Stoke are unable to have water meters due to low water pressure. The Parish Council would like to seek assurances that due diligence has been conducted with all the service providers, supported by written statements, to ensure the site and the Parish has enough capacity to support this new development, without negatively impacting the existing residents and their service provision.

In summary the Parish Council wishes to file an objection to this housing development, due to concerns of resident safety, lack of consideration for the proposals impact on the local environment and our existing residents, alongside considerations of the proposal not being technically viable against the National Planning and Policy Framework, UK Environmental Act and the UK Town and Country Planning Act.

Yours sincerely,

Mrs J. Allen
Clerk to Stoke Parish Council