



Councillor Michael Pearce
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Saturday 8th March 2025.

Mr Dave Harris

Chief Planning Officer
Local Planning Authority (LPA)
Medway Council
Gun Wharf Dock Road
Chatham
Kent
ME4 4TR

planning.representations@medway.gov.uk

CC: Aaron Nicholls (Senior Planner), Peter Hockney (Development Manager), Planning Committee Members and Katherine Wilkinson (Planning Casework Officer) of Active Travel England (ATE).

Re: MC/23/2857 (Land at The Former Sturdee Club, Stoke Road, Hoo, Rochester, Kent, ME3 9BJ).

Dear Mr Dave Harris (Chief Planning Officer),

This letter concerns planning application **MC/23/2857** (Land at The Former Sturdee Club, Stoke Road, Hoo, Rochester, Kent, ME3 9BJ) – *“Construction of 134no. residential dwellings (including affordable and over 55's homes), children's nursery (Class E(f)), cafe/community hub (Class E(b)/F2(b)) and commercial/retail floorspace (E(g)/E(a), new public open spaces, sustainable urban drainage systems, landscaping and biodiversity areas and play areas. Access to be from 4no. new locations from Stoke Road. Provision of roads, parking spaces and earthworks - Demolition of the Sturdee Club and associated structures”.*

Statutory Consultation with Active Travel England (ATE).

This application is being presented to the Local Planning Authority (LPA)'s Planning Committee on Wednesday 12th March with the officer recommendation of approval, subject to conditions and Section 106 developer contributions. It was brought to my attention by the case officer Aaron Nicholls on Friday 7th March that Active Travel England (ATE) had not been consulted on the planning application as a statutory consultee - this was due to a trigger for statutory consultation not being met because the application does not propose 150 new dwellings or more (which it technically doesn't). However, Active Travel England (ATE) has two other statutory consultation triggers where they must be consulted by the Local Planning Authority (LPA). The first is if the application is more than 7,500 square metres in size. The second is if the application is an area of at least five hectares.

<https://www.activetravelengland.gov.uk/planning#>

Although this specific planning application is not proposing 150 new dwellings or more, the applicant (Esquire Developments) does clearly have ambitions to bring forward another planning application soon for the missing parcel of land in-between Parcel A and Parcel C - this will exceed 150 new dwellings or more in the location. In fact, the applicant has shown plans for 330 new dwellings at the location when they submitted a representation for the recent Local Plan Regulation 18 consultation. It appears to me the applicant is attempting to avoid this trigger by bringing forward parts of the development in a piecemeal way. Because of this, I believe Active Travel England (ATE) should be consulted on the application, particularly as the site location has poor access to sustainable modes or transport and is significantly outside the built-up envelope of the village of Hoo. The cumulative effects of the applicant's long-term development ambition for this unsustainable location hasn't been assessed.

“Parcels A and C are separated by the existing residential dwelling, known as Dencher, and the agricultural field beyond. Whilst this is not part of the application site, this parcel of land has been considered to come forward in due course. The proposed layout has been designed so that does not prejudice it coming forward and connections points have been provided to actively facilitate its delivery.” – Esquire Developments, Planning Statement, paragraph 3.44.

Notwithstanding the above, the planning application does in fact require Active Travel England (ATE) to be consulted as a statutory consultee because of the other two triggers. According to the Officer's Report, published on the Medway Council website, the site area is 10.34 hectares - this is equivalent to 103,400 square metres and the proposed buildings certainly exceed 7,500 square metres collectively. Therefore the planning application meets either of these other two triggers requiring statutory consultation with Active Travel England (ATE).

Therefore, to ensure a 'lawful', 'fair' and 'reasonable' planning decision is made (Town and Country Planning Act 1990 and the Planning & Compulsory Purchase Act 2004 etc.), the only reasonable course of action is for the planning application to be removed from the Wednesday 12th March Planning Committee agenda and for the Local Planning Authority (LPA) to consult Active Travel England (ATE) on the application.

I have copied this letter to Katherine Wilkinson (Planning Casework Officer) of Active Travel England (ATE).

Best wishes and kind regards,

Michael Pearce

Councillor Michael Pearce
Independent
Hoo & High Halstow Ward
Medway Council