



**Councillor Michael Pearce**

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**Monday 3<sup>rd</sup> March 2025.**

**Local Planning Authority (LPA)**

Medway Council

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

Dear Local Planning Authority (LPA),

This representation concerns the **Principle of Development** for 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”.*

I **object** to this planning application for the reasons explained below.

**Opening statement and development in Hoo and Chattenden over recent years:**

In just twenty-five years, the population of Hoo and Chattenden has doubled in size - with most of this growth happening in the last ten years. In 2001 the population was 7,356, rising to 8,945 in 2011 and again to 13,782 in 2021. The population today, based on the current rate of growth, is estimated to be around 15,000 residents. Hoo is still a village and is proudly the largest village in Kent (by population). However, local infrastructure and services have not kept up with this significant population growth, and therefore the quality of life experienced by local residents has noticeably deteriorated. Measurable impacts can be felt by the lack of primary school places and the difficulty with obtaining a GP appointment at the two village GP practices.

The only tangible improvements to local infrastructure and services, to accommodate this growth, has been (to date); (1) a small extension to the St. Werburgh GP Practice branch off Bells Lane in Hoo, and (2) a new primary school at the Hundred of Hoo Academy off Main Road, Hoo. This is clearly not sufficient and local residents have been poorly served by Medway Council and the Local Planning Authority (LPA). The deficiency in local infrastructure and services needs to be addressed first - and be rectified to serve the existing population - before any further residential growth is even considered in Hoo and Chattenden.

Despite growing in population, Hoo and Chattenden have lost the following since 2001: (1) The BAE Sports Club, swimming pool and sports playing fields off Bells Lane, Hoo, (2) The Red Cross Community Hall off Stoke Road, Hoo, (3) The Boys Club Youth Centre off Stoke Road, Hoo, (4) The Victory Inn Public House off Stoke Road, Hoo, (5) The Bridge Tavern Public House off Church Street, Hoo, (6) Bradford’s Garage Petrol Station off Main Road, Hoo, (7) The Windmill Public House off Ratcliffe Highway, Hoo, (8) Deangate Ridge Golf Course off Dux Court Road, Hoo, (9) Elm Avenue Sports Playing Field off Elm Avenue, Chattenden and (10) The Old George Public House off Four Elms Hill, Hoo.

Hoo and Chattenden are unsustainable locations for further residential housing development (growth).

**The history of the site.**

The proposed development is split into three parcels; Parcel A is located to the west and is adjacent to Yew Tree Lodge, Stoke Road, Hoo, ME3 9BJ. Parcel B is located to the north and is adjacent to Sturdee Cottages, Stoke Road, Hoo, ME3 9LT. Parcel C is located to the east and is the site of the former Sturdee Club, Stoke Road, Hoo, ME3 9BJ.

Google Earth satellite imagery shows Parcel A and Parcel B have been in active use as productive agricultural land since 1940. Parcel C includes the former Sturdee Club building and surrounding land – a 6.5 acre sports club with playing fields. The club was established in 1932 for local residents and the workers of the Berry Wiggins & Co Limited oil refinery at Kingsnorth - which opened the same year. Satellite imagery shows a cricket pitch and a football pitch present on the site in

1990, and two football pitches (no cricket pitch) between 2003 and 2011. The site has been in active sports use for more than 20 years. The club stopped operating at the site in 2012 and is now based off Sturdee Avenue in Gillingham.

Many residents recall using the Sturdee Club and playing fields in the 1960s, 1970s, 1980s and 1990s for cricket matches, football matches, wedding receptions, birthday parties and socialising.

## **PRINCIPLE OF DEVELOPMENT**

### **The loss of existing open space, sports buildings and land, and playing fields.**

The proposed development (Parcel C) will remove an existing 6.5 acre sports playing field. This is when the local community has already lost, in recent times, a 8 acre sports playing field site off Elm Avenue in Chattenden, a 5 acre sports playing field off Bells Lane in Hoo and a 10 acre sports playing field site off Bells Lane in Hoo. The applicant hasn't provided an assessment demonstrating the 6.5 acre sports playing field is surplus to requirements. The applicant is also not proposing any replacement or better sports provision on the site. This is contrary to the National Planning Policy Framework (NPPF), which states:

Paragraph 103: ***"103. Access to a network of high quality open spaces and opportunities for sport and physical activity is important for the health and well-being of communities, and can deliver wider benefits for nature and support efforts to address climate change. Planning policies should be based on robust and up-to-date assessments of the need for open space, sport and recreation facilities (including quantitative or qualitative deficits or surpluses) and opportunities for new provision. Information gained from the assessments should be used to determine what open space, sport and recreational provision is needed, which plans should then seek to accommodate."***

Paragraph 104: ***"Existing open space, sports and recreational buildings and land, including playing fields and formal play spaces, should not be built on unless: a) an assessment has been undertaken which has clearly shown the open space, buildings or land to be surplus to requirements; or b) the loss resulting from the proposed development would be replaced by equivalent or better provision in terms of quantity and quality in a suitable location; or c) the development is for alternative sports and recreational provision, the benefits of which clearly outweigh the loss of the current or former use."***

Fundamentally, the proposed development is a missed opportunity to bring the Sturdee Club (or equivalent) and sports playing fields back into use for the local community.

### **The loss of Grade One agricultural land and the importance of national food security.**

According to Natural England (the Agricultural Land Classification map London and the South East ALC007), the proposed development (Parcel A and Parcel B) will remove 18 acres of active and productive Grade 1 (Excellent) agricultural land. The average wheat yield per acre in the southeast is 4.5 tonnes, and every tonne of milling wheat produces 1,538 loaves of bread. This means the farmland being removed can annually produce an incredible 124,578 loaves of bread. This can feed 2,066 people based on the average person in Britain consuming 60.3 loaves per year.

According to the Department for Environment, Food & Rural Affairs (United Kingdom Food Security Report 2021: Theme 2: UK Food Supply Sources - Updated 22 October 2024), Britain imports 46% of the food it consumes. Food security is defined as having a strong and consistent domestic production of food combined with a diversity of supply sources that avoids overreliance on any one source. Developing this top-grade productive farmland would be contrary to the National Planning Policy Framework (NPPF), which states:

Paragraph 88.b: ***"Planning policies and decisions should enable: b) the development and diversification of agricultural and other land-based rural businesses;"***

Paragraph 187.b: ***"Planning policies and decisions should contribute to and enhance the natural and local environment by: b) recognising the intrinsic character and beauty of the countryside, and the wider benefits from natural capital and ecosystem services – including the economic and other benefits of the best and most versatile agricultural land, and of trees and woodland;"***

Note 65: ***"Where significant development of agricultural land is demonstrated to be necessary, areas of poorer quality land should be preferred to those of a higher quality."***

### **The site is not allocated in the Hoo & Chattenden Neighbourhood Plan (HCNP).**

The recently approved (or 'made') Hoo & Chattenden Neighbourhood Plan (HCNP) is now part of the Local Planning Authority (LPA)'s statutory development plan and is the most up-to-date planning policy for the local area. This means section 38 of the Planning and Compulsory Purchase Act 2004 applies:

***"(3A) For the purposes of any area in England (but subject to subsection 3B) a neighbourhood development plan which relates to that area also forms part of the development plan for that area if – (a) section 38A(4)(a) (approval by referendum) applies in relation to the neighbourhood development plan, but (b) the local planning authority to whom the proposal for the making of the plan has been made have not made the plan. (3B) The neighbourhood development plan ceases to form part of the development plan if the local planning authority decide under section 38A(6) not to make the plan."***

This requires planning applications to be determined in accordance with the policies of the development plan, unless material considerations indicate otherwise. The National Planning Policy Framework (NPPF) states:

Paragraph 30: ***“Neighbourhood planning gives communities the power to develop a shared vision for their area. Neighbourhood plans can shape, direct and help to deliver sustainable development, by influencing local planning decisions as part of the statutory development plan. Neighbourhood plans should not promote less development than set out in the strategic policies for the area, or undermine those strategic policies.”***

Paragraph 31: ***“Once a neighbourhood plan has been brought into force, the policies it contains take precedence over existing non-strategic policies in a local plan covering the neighbourhood area, where they are in conflict; unless they are superseded by strategic or non-strategic policies that are adopted subsequently.”***

The proposed site is also not allocated for development in the Hoo & Chattenden Neighbourhood Plan (HCNP) and does not comply with the following policy:

Policy H004: Housing Growth and Mix. 1: ***“In addition to strategic sites allocated by the Local Plan, residential development will be supported in the following locations: a. in existing built settlements, including brownfield sites and infill development within existing built frontages; b. upper floors in commercial properties, providing there is no resulting conflict with existing commercial uses and the scheme can provide satisfactory residential standards; c. conversion of agricultural buildings, as provided for within the NPPF.”***

The proposed development is located to the east of Hoo and is isolated (particularly Parcel C) and detached from the existing envelope of the village. The proposal is not a “natural extension” to the existing built-up settlement of Hoo. A large central section of the development is also missing from the proposals - this is unacceptable and isn’t good planning practice, as the piecemeal approach can undermine the cumulative impacts of the development and the mitigation required to attempt to make the development sustainable. The proposed development is contrary to the National Planning Policy Framework (NPPF) and the Hoo & Chattenden Neighbourhood Plan (HCNP).

### **The site is not allocated in the 2003 Medway Local Plan.**

The only ‘made’ (adopted) strategic planning policy in existence for the Local Planning Authority (LPA) is the 2003 Medway Local Plan. Despite being over twenty years old, this strategic policy still carries significant weight. This can be seen from the various refusals made by the Local Planning Authority (LPA) and the subsequent dismissals by the Planning Inspector. The proposed development is not allocated in the 2003 Medway Local Plan (Policy H1: New Residential Development) and is therefore contrary to it. The 2003 Medway Local Plan states:

Policy BNE25 - Development in the Countryside: ***“Development in the countryside will only be permitted if: (i) it maintains, and wherever possible enhances, the character, amenity and functioning of the countryside, including the river environment of the Medway and Thames, it offers a realistic chance of access by a range of transport modes; and is either; (ii) on a site allocated for that use; or (iii) development essentially demanding a countryside location (such as agriculture, forestry, outdoor or informal recreation); or (iv) a re-use or adaptation of an existing building that is, and would continue to be, in keeping with its surroundings in accordance with Policy BNE27; or (v) a re-use or redevelopment of the existing built-up area of a redundant institutional complex or other developed land in lawful use; or (vi) a rebuilding of, or modest extension or annex to, a dwelling; or (vii) a public or institutional use for which the countryside location is justified and which does not result in volumes of traffic that would damage rural amenity. The countryside is defined as that land outside the urban and rural settlement boundaries defined on the proposals map.”***

The proposed development does not comply with parts (i), (ii), (iii), (iv), (v), (vi) or (vii) of BNE25.

### **The planning application is premature and predetermines the emerging new Local Plan.**

According to the Medway Council Forward Plan (Regulation 19 stage - Publication of the Pre-Submission Draft Local Plan), a report concerning the Local Plan will be presented to Cabinet at a meeting on 3<sup>rd</sup> June 2025. The summary states: ***“This report will ask the Cabinet to recommend publication of the pre-submission draft Medway Local Plan to Full Council for approval.”*** This planning application concerns a significant strategic site to the east of the settlement of Hoo. The application is being determined before the publication of the Regulation 19 Draft Local Plan. This is therefore predetermination of the strategic spatial strategy of that plan - because approving this application will have a significant impact and force plan-making in a particular direction (predominantly development outside the village envelopes of Hoo and Chattenden).

The proposed development will have a substantial impact on Hoo and its cumulative negative effects will be significant. This will undermine the plan-making process, predetermining decisions about the scale, location or phasing of new development that are central to an emerging Local Plan. The emerging Local Plan is at an advanced stage (advance Regulation 18 stage and soon to be Regulation 19 stage) - but is not yet formally part of the development plan for the area. Approving this application (particularly now) will be contrary to the National Planning Policy Framework (NPPF), which states:

Paragraph 50: ***“However, in the context of the Framework - and in particular the presumption in favour of sustainable development - arguments that an application is premature are unlikely to justify a refusal of planning permission other than in the limited circumstances where both: a) the development proposed is so substantial, or its cumulative effect would be so significant, that to grant permission would undermine the plan-making process by predetermining decisions about the scale, location or phasing of new development that are central to an emerging plan; and b) the emerging plan is at an advanced stage but is not yet formally part of the development plan for the area.”***

The proposed development site is identified as a “preferred site” in the recent Regulation 18 consultation of the emerging new Local Plan. However, this does not carry any weight in planning terms because the new Local Plan is yet to be tested for

soundness and hasn't been "made" (adopted) as strategic planning policy. The site may (emphasise may) be deemed sustainable in due course as part of a wider spatial strategy and accompanying infrastructure in the form of a new Local Plan. But, as things stand today, the site is not automatically sustainable because of the Regulation 18 consultation, and the planning application must therefore be determined on its own merits.

### **Withdrawal of the £170m Housing Infrastructure Fund (HIF) Project and the lack of infrastructure capacity.**

In April 2019 Medway Council submitted a bid to Homes England for £170m from the Housing Infrastructure Fund (HIF) scheme. This project (referred to as the HIF Project) was called "New Routes to Good Growth" and was designed to "unlock" up to 12,100 new houses specifically on the Hoo Peninsula. This would be achieved by increasing strategic highways, rail and environmental infrastructure capacity to accommodate growth (development) - therefore achieving sustainable development and compliance with the National Planning Policy Framework (NPPF). The project was a fundamental requirement in order for further development to take place on the Hoo Peninsula.

Medway Council's bid was successful and granted in November 2019, but Homes England later withdrew the funding in July 2023. The 2019 bid documentation detailed the following strategic infrastructure schemes on pages 13, 14, 15 and 16:

#### **Highways.**

Description: *"A Relief Road linking the A289 west to the Peninsula. Capacity improvements at three junctions on the Peninsula that would service the new developments and link to the Relief Road. Improvements to the A289, including enhancements at three roundabouts to improve traffic capacity."*

Link to housing: *"All road-based trips generated by new housing on the peninsula will need to utilise the A228 and pass through the Four Elms roundabout to access the strategic road network. Junctions on A289, including Four Elms Roundabout and Anthony's Way, and the A228 Main Road junction, have been shown through modelling to be at breaking point with trip growth from up to 2,000 homes. The proposed network upgrades involve capacity improvements and link upgrades to 4 junctions on the A289 and 3 junctions on the A228. They include new slip roads and an A228 Relief Road, with a grade-separated link to and from A289. The upgrades will provide a workable arterial road for the new community on Hoo Peninsula."*

#### **Rail.**

Description: *"A new railway Station (Sharnal Street Station); Improvements to the existing Grain railway line; A new Medway Chord and mainline connection; and Re-signalling of the existing line."*

Link to housing: *"If the full highway scheme and passenger rail proposals are implemented, modelling has demonstrated that: The transportation proposals that include highway interventions alone would release sufficient network capacity to accommodate 8,000 homes. With a passenger rail service provided from a new Sharnal Street rail station, a further 2,600 homes could be accommodated on the network, a direct result of mode shift from car to rail."*

#### **Green infrastructure.**

Description: *"Strategic Environmental Management Scheme (SEMS). Establishment of blue & green networks protecting landscape & ecology designations, providing active travel links, and maintaining settlement boundaries. 4 SEMS zones across the Hoo Peninsula will deliver: • 10,000m of hedging (habitat, shelter & movement routes) • 4000 hedgerow trees • 1000 parkland trees • 10ha of native woodland/community orchard • 150ha of wetlands • 365ha of nationally important habitat protected from residential/ recreational pressures and disturbance • Interpretation facilities."*

Link to housing: *"Environmental designations and other constraints provide a ceiling on residential development of 940 homes. Medway Council is resisting new applications unless provision for strategic environmental enhancement is incorporated to avoid: impacts on key bird habitats of international significance; minimise light pollution, and manage visitor/user impacts. This mitigation needs to be in place and functional before housing development can proceed."*

The Local Planning Authority (LPA) recognises the significant infrastructure constraints on the Hoo Peninsula restricting further development - the evidence and fundamental purpose of the Housing Infrastructure Fund (HIF) Project supports this position. The proposed development should not be granted permission due to the lack of infrastructure capacity (particularly highways). The proposal can't be considered sustainable development and is therefore contrary to the National Planning Policy Framework (NPPF).

### **The significant environmental constraints of the Hoo Peninsula and the residential development ceiling (940 houses).**

The Hoo Peninsula is internationally and nationally important for its wildlife habitat and consists of several sites with environmental designations. Two areas are of particular importance: The Medway Estuary & Marshes and The South Thames Estuary & Marshes. Both are internationally designated as RAMSAR (The Ramsar Convention on Wetlands of International Importance Especially as Waterfowl Habitat) sites. Both are nationally designated Special Protection Areas (SPAs). Both are nationally designated Sites of Special Scientific Interest (SSSI).

The Hoo Peninsula also contains many other Sites of Special Scientific Interest (SSSIs), including: Chattenden Woods & Lodge Hill SSSI, Tower Hill to Cockham Wood SSSI, Northward Hill SSSI and Dalham Farm SSSI. Plus, Shorne & Ashenbank Woods SSSI and Cobham Woods SSSI are close by. The Hoo Peninsula is also home to a National Nature Reserve (NNR) at Northward Hill and has potential for Local Nature Reserve (LNR) designations at various locations, including Deangate Ridge,

Hoo Common, Hoo Wetlands/Abbots Court, Grain Coastal Park, Cross Park (Allhallows), Allhallows Marshes and Eternal Lake (Cliffe).

The Local Planning Authority (LPA) recognises these significant environmental constraints which restricts residential development on the Hoo Peninsula to no more than 940 houses (assessed in April 2019) - although Local Planning Authority (LPA) is minded to not approve any more development on the Hoo Peninsula until significant environmental mitigation is secured and, more importantly, implemented. This is explained in various sections of Medway Council's bid documentation for the £170m Housing Infrastructure Fund (HIF) Project called "New Routes to Good Growth":

Page 2: *"Poor connections to Medway, Kent and elsewhere, limited infrastructure capacity, and extensive environmental designations mean that housing development has been incremental and restricted. While development is limited to 2,000 units without key transport infrastructure, environmental 'capacity' effectively restricts housing development at Hoo to 940 units. The cost and scale of the required infrastructure undermines development viability. While S106 contributions would be attracted, they will be insufficient for the infrastructure needed to unlock the 10,600 homes. Moreover, related funds will be received incrementally over a long period, severely delaying infrastructure and housing delivery."*

Page 16: *"Transport constraints are compounded by strategic environmental and drainage considerations. In the absence of HIF funding for strategic mitigation, the scale of potential housing on the Hoo Peninsula is further reduced to a threshold of 940 units. The combined infrastructure interventions will enable development of some 10,600 homes, providing additional highway and rail passenger capacity, promoting modal choice. The relief road will also provide further network resilience, removing existing constraints which presently see frequent closure of the Four Elms roundabout in inclement weather, and addressing poor air quality on Four Elms Hill. Road & rail interventions will enable a respective 8,000 and 2,600 homes to be developed on the Hoo Peninsula Site No.3 (Appendix 2) and the HIF supported relief road effectively underpin the Council's ability to meet its forecast housing needs (calculated using the Standard Method in preparing the emerging Local Plan). Furthermore, environmental constraints – SSSI's and other designations currently limit development to a maximum of 940 homes. The recent experience of major planning applications serves to underline these constraints and their constraining effect on development."*

Page 32: *"The Options Appraisal describe the counterfactual position, indicating a further 2,000 homes might be built on the Hoo Peninsula before the limit of strategic transport infrastructure - the A288, A289 and Four Elms roundabout – is reached. However, strategic environmental constraints linked to habitat protection and other factors further restrict the counterfactual position to 940 units. Unless these are addressed, Medway Council will cap residential development on the Hoo Peninsula to those sites which presently have planning permission. These sites have a capacity for 940 units."*

Page 41: *"In the absence of intervention, it is expected that residential sites on the Hoo Peninsula would remain developable but not deliverable. The Hoo Peninsula is constrained by having a single A class access road linking existing communities to the strategic road network. All road-based trips generated by new housing on the Peninsula will need to use this corridor where the existing highway network is close to, and in some areas, at capacity. There is severe congestion on the A289 and A228 during peak times. There are no further routing options or local road permeability that could accommodate trip growth. There would be no change to the current passenger rail service other than trains from Strood and Rochester being busier and fewer car parking spaces being available at stations. The current level of freight traffic would continue on the Grain line. Network Rail have indicated that they and DfT would look at providing a passing loop somewhere on the Grain line to cater for future freight growth. Dependent development testing has indicated that the current transport infrastructure can theoretically support a maximum of 2,000 homes across the Hoo Peninsula. However, the Council would be minded not to grant planning permission above the 940 homes that currently have planning permission on the Peninsula. The Council recognises that this would be forgoing the opportunity for an additional 1,060 homes on the Peninsula. However, the Council believe that any further development without upgrading the existing social and transport infrastructure, including the SEMS, would create a significant dis-benefit to existing users. Following business case guidance and for the purposes of the economic analysis, the theoretical deadweight will remain at 2,000 homes on the Hoo Peninsula. The Council believes that this provides a robust approach to the analysis presented in the Economic Case. It is expected that the development would be spread over 5 years (2019-2024)."*

Page 44 and 45: *"The Hoo Peninsula scheme presents a significant opportunity for the Council to enable the delivery of 10,600 homes by 2035. If funding was not received, housing on the Hoo Peninsula would be developable but not deliverable. Development would be restricted to a theoretical build out of 2,000 homes, but in reality, the Council is likely to refuse planning permission over and above the 940 homes currently with permission."*

In the absence of significant infrastructure capacity upgrades - including highways, rail and environmental - the bid documentation makes very clear the Local Planning Authority (LPA) will not permit any further development on the Hoo Peninsula on top of the 940 houses already with planning consent (but not yet built out). The Local Planning Authority (LPA) believes any further development without upgrading the existing social and transport infrastructure, and specifically environmental measures, would create a significant dis-benefit to existing users.

The proposed development does not include any significant measures to overcome these constraints on the Hoo Peninsula. Therefore, the proposal does not constitute sustainable development and is contrary to the National Planning Policy Framework (NPPF).

### **The failed Taylor Wimpey planning application and appeal proposing significant development west of Hoo.**

In November 2014 Taylor Wimpey submitted a planning application (MC/14/3405) to build up to 475 houses off Ratcliffe Highway (Land West of Hoo) - located within the Chattenden Valley between Hoo and Chattenden:

*“Outline application with some matters reserved (appearance, landscaping, layout and scale) for the construction of up to 475 dwellings including affordable housing, commercial floorspace (Use Classes A1/A3/A5, up to 200sqm), sports pavilion (Use Class D2, up to 200sqm), associated public open space, multi-functional green infrastructure, outdoor sports facilities, access, parking, infrastructure, landscaping, attenuation and earthworks.”*

In April 2015 the Local Planning Authority (LPA) recommended refusal to the Planning Committee who agreed, and the application was refused for the following reasons:

*“The application is an unsustainable form of development which would be poorly related to the settlement of Hoo and overly reliant on the private car, and would fail to meet social, environmental and economic objectives. The presumption in favour of sustainable development as set out in the NPPF therefore does not apply and benefits arising from the delivery of housing would not be sufficient to outweigh this. The proposal would be contrary to the policies and principles set out at paragraphs 7, 8, 14, 17, 34 and 70 of the NPPF.”*

*“The application would cause significant harm to the local landscape, and cause coalescence between the settlements of Hoo St Werburgh and Chattenden. It would therefore be contrary to the provisions of Policies BNE34 and BNE1 of the Medway Local Plan 2003, the Medway Landscape Character Assessment 2011, and to the policies and principles set out at paragraphs 17 and 109 of the NPPF.”*

Taylor Wimpey appealed the refusal (APP/A2280/W/15/3132141) and the Planning Inspector upheld the Local Planning Authority (LPA)'s decision for the following reasons:

*“84. There is harm to character and appearance; harm in principle from the use of greenfield land and some harm resulting from the coalescence of Hoo and Chattenden caused by development on Fields F1 in particular and, to a lesser degree on field F2. But, the use of greenfield land for housing in Medway is inevitable as the Council’s Local plan Issues and Options report makes clear; this site has no special or unusual character and so I regard its loss as moderately harmful. The fundamental landscape function of the Deangate and Cockham Farm ridges in providing structure to the landscape would not be compromised, so I regard the coalescence element of harm to character and appearance as relatively minor. Clearly, although harm to character and appearance would be an enduring harm, on its own it would not outweigh the benefits of the development.”*

*“85. But, add in the harm which would be caused, in the local context, by the high dependency on car travel resulting from the failure to make the site as sustainable a location as Hoo village itself and the balance is different. This too would be an enduring harm which I have found to be significant. The combination of harms would outweigh the temporal advantages of bringing forward housing now. In consequence, the proposal cannot be said to be a sustainable development. That being so, the presumption in favour of sustainable development cannot apply. Notwithstanding the consequences of the advice in NPF paragraph 49 that the housing supply policies are not up to date, there are insufficient material considerations to warrant a decision other than in accordance with the development plan and so, I dismiss the appeal.”*

Although the proposed development is not located within the Chattenden Valley (between Hoo and Chattenden), there are relevant considerations and comparisons with the Taylor Wimpey proposal. The proposed development is isolated (particularly Parcel C) and is therefore poorly related to the settlement of Hoo. It is a considerable distance away from the centre of the village (and local services) and is positioned on the outskirts of the community at the end of an access road. The proposed development will be overly reliant and significantly dependent on the private car for transport. The development site is not as sustainable a location (in development terms) as the village of Hoo itself. Since the Taylor Wimpey decision, the village of Hoo has become a more unsustainable location - this is due to a significant increase in population with no services to match, and the loss of a number of community assets and facilities.

The proposed development should be refused on the same grounds as it does not constitute sustainable development - and is therefore contrary to the National Planning Policy Framework (NPPF).

At the time of the appeal being dismissed, the Planning Inspector stated the Local Planning Authority (LPA)'s Five Year Land Supply (FYLS) was between 2.21 and 2.79 years, with a shortfall of between 2.79 and 2.21 years' requirements. According to the Performance Report (1st July 2024 to 30th September 2024) presented to the Planning Committee in November 2024, the Local Planning Authority (LPA)'s housing requirement for years 18/19, 19/20, 20/21, 21/22 and 22/23 was 8,273 or 1,654 houses a year. The number of completions for the same period was 4,911 - meaning the Local Planning Authority has a Five Year Land Supply (FYLS) of 2.97. This is a greater than when Taylor Wimpey's planning application was refused by the Local Planning Authority (LPA) and the appeal was dismissed by the Planning Inspector.

The Local Planning Authority (LPA) is in a better position with housing completions to refuse this proposed development.

#### **Lack of local primary school places and local GP practices are at full capacity.**

The Annual Review of the School Place Planning Strategy 2022-27 was presented to Medway Council's Cabinet in October 2024. The report and appendices show primary school places at Chattenden Primary School, Hoo St. Werburgh Primary School and The Hundred of Hoo Academy Primary School have all been filled to capacity since 2015. These three primary schools are closest to the proposed development, meaning new residents will need to travel outside of the village in order for their children to access primary school provision. Concerningly, the report also includes forecasts showing reception rolls will peak at a high level in 2026 and will still be above capacity in 2027 and 2028. The report states:

*“Peninsula West is a largely rural area which covers six primary schools which have been filled to capacity since 2015. Forecasts show reception rolls will peak at a high level in 2026, and will still be above current capacity in 2027 and 2028. The bulk of Medway's new housing is being targeted in this planning area and this is impacting on total roll numbers. Some*

*of these developments have been approved and are underway, but there are still more to come and so are not yet included in the forecast. Hundred of Hoo Academy primary phase has been expanded to 2 forms of entry. This project is providing additional capacity from September 2023 to cope with demand from local new housing. Further large housing developments are expected to provide new primary provision. It is likely that more immediate capacity will be needed to deal with the 2026 peak and to that end a feasibility study has been undertaken at Hoo St Werburgh to explore the options to expand to 3FE."*

Hoo is served by St. Werburgh Medical Practice (located off Bells Lane) and The Elms Medical Practice (located off Main Road) - both are located in the village. The two practices also serve surrounding villages, including: Chattenden, High Halstow, St. Mary Hoo, Lower Stoke, Middle Stoke, Upper Stoke, Allhallows and Grain. According to NHS England's 'Patients Registered at a GP Practice' data, St. Werburgh Medical Practice has 9,412 registered patients (February 2025) and The Elms Medical Practice has 12,412 registered patients (21,824 registered patients in total).

According to Statista, the average number of registered patients per GP practice (national average) was 10,233 in 2024. This suggests the Elms Medical Practice is over-pressured and the St. Werburgh Medical Practice is under-pressured with registered patients. When both figures are combined, local GP practices are in general over-pressured due to the size of the local population - particularly when the national average figure takes urban areas, such as towns and cities, into account (where there are generally better health facilities and more GPs). The Local Planning Authority (LPA) recognises, in their latest evidence base for the Regulation 18 consultation, that the Hoo Peninsula is the most disadvantaged location in the Medway Council area when it comes to primary health provision.

This evidence clearly demonstrates that Hoo and Chattenden are unsustainable locations. Therefore the proposal is not sustainable development and is contrary to the National Planning Policy Framework (NPPF).

### **Conclusion.**

In conclusion, the presumption in favour of sustainable development does not apply because the proposed development does not constitute sustainable development for the many reasons explained above. The adverse impacts of granting permission would significantly and demonstrably outweigh the benefits, when assessed against the policies in the National Planning Policy Framework (NPPF) taken as a whole. Hoo is not a sustainable location for this development (growth) and the proposal will not secure a well-designed place. The adverse impacts are significant and include increases in unsustainable modes of transport and greater negative impacts on highways, education and health provision capacity for the existing local community. The portrayed advantage of bringing forward housing development now does not outweigh this significant harm.

**There are strong and reasonable grounds to refuse this planning application.**

Best wishes and kind regards,

*Michael Pearce*

**Councillor Michael Pearce**  
Independent  
Hoo & High Halstow Ward  
Medway Council