



**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 **Design and Access** 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.

**DESIGN OF THE DEVELOPMENT**

**Overview of the development site and the lack of connection/relationship between Parcel A, Parcel B and Parcel C.**

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. There is a large section of the proposed development missing from the plans - located in-between Parcel A and Parcel C, and opposite Parcel B. I will refer to this missing Parcel as Parcel X. I understand Parcel X isn’t included as part of this planning application due to ongoing negotiations between the landowner and the applicant. Therefore, the proposal can only be judged on its own merits (Parcels A, B and C) and their connection/relationship with each other, and their setting within Hoo village.

A loose connection/relationship exists between Parcel A and Parcel B with one small point across Stoke Road, whereas there is absolutely no connection or relationship between Parcel C and Parcel A/Parcel B. Parcel C is completely isolated and inappropriate development, located outside the built-up envelope of Hoo village. Parcel B can be reasonably argued as connected or “bolted on” to Sturdee Cottages off Stoke Road, Hoo and is therefore the more acceptable of the three parcels. Parcel A is also arguably isolated and inappropriate development, being located outside the built-up envelope. The applicant may argue the land adjacent to Yew Tree Lodge has planning permission and therefore the new boundary of the village built-up envelope will be adjacent to Parcel A. However, this development is yet to be built out and so this boundary does not physically exist yet.

The absence of Parcel X in the design plans and not being included as part of this planning application is fundamentally problematic - in sustainability and planning policy compliance terms. The proposal results in isolated and poorly connected development outside the village built-up envelope (with Parcel C). This does not promote healthy and safe communities and is therefore contrary to the National Planning Policy Framework (NPPF), which states:

Paragraph 96: ***“Planning policies and decisions should aim to achieve healthy, inclusive and safe places which: a) promote social interaction, including opportunities for meetings between people who might not otherwise come into contact with each other – for example through mixed-use developments, strong neighbourhood centres, street layouts that allow for easy pedestrian and cycle connections within and between neighbourhoods, and active street frontages;”***

The proposal is not well designed and does not create a sustainable and locally distinctive place. This will harm Hoo’s historic and rural character and is therefore contrary to the Hoo & Chattenden Neighbourhood Plan (HCNP), which states:

Policy H006: Design, Paragraph 1 and 2: ***“Development must be well designed to create a sustainable and locally distinctive places, to complement Hoo’s historic and rural character. To achieve this, proposals must demonstrate that their design: a.***

*complements the predominantly 2-3 storey character of the area; b. complements the surrounding townscape in terms of scale, massing and degree of set-back of building frontages from the road; c. provides active frontages (containing windows) facing public roads and spaces, to provide natural surveillance; d. provides boundary treatments to road frontages to complement traditional boundary treatments, including low flint or brick walls and hedges."*

**The proposed business units are inappropriate development and compete with nearby Kingsnorth.**

The proposed development includes three blocks of business units located on the eastern end of Parcel C. The planning application describes their use as commercial/retail floorspace (E(g)/E(a)). This is unnecessary as the significant and largely vacant Kingsnorth Industrial/Commercial Estate is located less than a mile away from the development site. The part of the development site where these business units are proposed is active and productive top grade agricultural land (Grade One).

This area is not allocated for business/commercial use in the 2003 Medway Local Plan or the Hoo & Chattenden Neighbourhood Plan (HCNP). Nor is the land (east Parcel C) a brownfield site or adjacent to existing built settlements (the village envelope of Hoo). The business units are likely to seriously undermine the commercial viability of the Kingsnorth Industrial/Commercial Estate where the Medway One project has spent significant sums (tens of millions of pounds) bringing the former Kingsnorth Power Station site back into use as a modern commercial park. The proposed development is contrary to the Hoo & Chattenden Neighbourhood Plan (HCNP), which states:

Policy H001: Employment Development, Paragraph 1, 2 and 3: ***"Employment development is supported in principle and appropriately according to location through: a. redevelopment of brownfield sites within or adjacent to the built settlements; b. redevelopment or improvement of existing employment sites. Support for employment development is subject to the site having adequate and safe access to a highway with sufficient capacity and there being no adverse impact on: a. the viability of other employment sites; b. the amenities of residential properties by reason of visual intrusion, noise, dust, disturbance, vibration, vehicle movements or other impacts; c. the historic environment; d. the rural character, landscape and natural environment. Within the village centres, Use Class E and F1 activities will be supported, including recreational, cultural and other community facilities."***

#### **Other important design matters and missed opportunities:**

- The proposed development is a fundamental missed opportunity. With the removal of the three blocks of business units located on the eastern end of Parcel C, the applicant could have incorporated a new sports club and playing fields to replace the former Sturdee Club. This would have been welcomed and celebrated by the local community. Unfortunately, the proposed development is another case of the local community losing another sports facility and playing fields, despite the local population growing considerably.
- The applicant has removed the proposed Multi Use Games Area (MUGA) from the plans when this was included in the original consultation documentation. This MUGA should be incorporated as part of the design of the development as local residents are of the understanding the proposed development will include a MUGA.
- The Café/Community Hub should be removed from the proposed development as this will compete with a priority community project in Hoo to replace the village hall with a brand new and significant Community Centre - meeting all the needs of local people. This project is being led by Hoo & Chattenden Parish Council. A number of developers around Hoo are proposing community buildings and this will detract from this project and divide resources. Hoo does not need several small community buildings scattered around the village - these resources should be directed at the main project.
- The proposed development does not include any new allotment provision. This is another missed opportunity and denies the local community more plots that are desperately needed. There is adequate room on the development plans to include an allotment site.

#### **ACCESS TO AND FROM THE DEVELOPMENT**

##### **Walking distance from the proposed development and the centre of Hoo.**

According to the Royal Town Planning Institute (RTPI), the 15-minute neighbourhood concept recognises that local residents should be able to access their primary daily needs within a 15-minute walking timeframe from where they live. Primary daily needs includes health (GP practice), education (nursery, primary and secondary schools) and shops (food and essentials). This concept is a fundamental part of what constitutes sustainable development. Active Travel England (ATE) uses the 15-minute neighbourhood concept to assess planning applications, although they haven't submitted a representation to this application (they have done so for other live applications in Hoo).

Using Google Maps, I have assessed the walking distance and timeframe from the centre of Hoo (identified as outside Pink Paprika 2 Main Road, Hoo, ME3 9AD) to the entrance of Parcel A, Parcel B and Parcel C (two entrances) off Stoke Road. It is reasonable to add an extra one, two or three minutes to take into account the distance and time to walk from the centre of each parcel to Stoke Road. The data for this assessment is shown below:

##### **Parcel A.**

Walking distance from the centre of Hoo to the parcel: **0.6 miles.**

Timeframe from the centre of Hoo to the parcel: **14 minutes.**

Additional minutes to compensate for walking from Stoke Road to the centre of the parcel: **2 minutes.**

**Parcel B.**

Walking distance from the centre of Hoo to the parcel: **0.7 miles.**

Timeframe from the centre of Hoo to the parcel: **15 minutes.**

Additional minutes to compensate for walking from Stoke Road to the centre of the parcel: **1 minutes.**

**Parcel C (western entrance).**

Walking distance from the centre of Hoo to the parcel: **0.8 miles.**

Timeframe from the centre of Hoo to the parcel: **17 minutes.**

Additional minutes to compensate for walking from Stoke Road to the centre of the parcel: **3 minutes.**

**Parcel C (eastern entrance).**

Walking distance from the centre of Hoo to the parcel: **0.9 miles.**

Timeframe from the centre of Hoo to the parcel: **20 minutes.**

Additional minutes to compensate for walking from Stoke Road to the centre of the parcel: **3 minutes.**

As can be seen from the assessment above, all three parcels have walking distances and times exceeding the 15-minute requirement to be considered sustainable in terms of the 15-minute neighbourhood concept. This means new residents are too far away from essential services to meet their daily needs. The proposed development is isolated, inappropriate and unsustainable because of the lack of realistic sustainable modes of transport.

**There is no bus service or route serving Stoke Road in Hoo.**

The proposed development is located off Stoke Road which is one of the main entrances and exits out of Hoo. This route is not currently served by a regular bus meaning new residents are more likely to use their private car to access services within the centre of Hoo or employment outside the village. As explained above, the proposed development is not sustainable in terms of the 15-minute neighbourhood concept and this unsustainability is compounded by the fact there is no regular bus service or route along Stoke Road.

**Stoke Road is in a poor and unsuitable condition for pedestrians and cyclists.**

Due to many development sites being permitted along Stoke Road in recent years, the pedestrian access along Stoke Road has become chaotic and unattractive to users. There are parts of Stoke Road where the footpath widens considerably but then narrows significantly. There are stretches of Stoke Road where the footpath is so thin it forces pedestrians to walk in the road, especially if there are pedestrians walking in the opposite direction. Stretches of Stoke Road on one side do not have a footpath. This disorder has come about since a number of new junctions have been created on Stoke Road to serve permitted development.

Medway Council and the Highways Authority has been asked to carry out a Road Safety Audit to assess what measures and schemes need to be introduced to make Stoke Road safe and attractive for pedestrians, cyclists and vehicles. At present, Stoke Road cannot accommodate further development until these important matters are first rectified in the interests of safety and accessibility.

Under this heading it is important to highlight that the proposed footpaths leaving the eastern end of Parcel C onto Jacobs Lane are not suitable as this road is a very narrow country lane. This would result in pedestrians coming into contact with vehicles down a steep bank.

**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

