



**Councillor Michael Pearce**  
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**Monday 10<sup>th</sup> March 2025.**

Local Planning Authority (LPA)  
 Medway Council  
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 Kent  
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CC: Aaron Nicholls (Senior Planner), Dave Harris (Chief Planning Officer), Peter Hockney (Development Manager) and Planning Committee Members.

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

Dear Local Planning Authority (LPA),

This letter details my representation to the Planning Committee concerning 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”.

**Proposed changes/wording to the Section 106 Developer Contributions.**

Existing wording:	Proposed new changes/wording:
Page 1 (Officer's Report):  <i>“vi. £489,169.09 for primary provision within 2 miles of development site or SEND education within Medway.”</i>	<i>“vi. £489,169.09 for primary provision within 2 miles of development site or SEND education on the Hoo Peninsula.”</i>  Reason: The former Stoke Primary School is becoming a SEND school and is located around 2 miles away from the proposed development. Section 106 funding should not be potentially leaving the Hoo Peninsula.
Page 1 (Officer's Report):  <i>“vii. £387,585.48 for secondary provision or SEND within Medway.”</i>	<i>“vii. £387,585.48 for secondary provision or SEND education on the Hoo Peninsula.”</i>  Reason: For the same reasons stated above.
Page 2 (Officer's Report):  <i>“viii. £95,201.64 health contribution towards extension/refurbishment or upgrading of existing proactive premises within the vicinity or contribution to a new facility.”</i>	<i>“viii. £95,201.64 health contribution towards extension/refurbishment or upgrading of existing proactive premises within the Hoo area or contribution to a new facility.”</i>  Reason: A more clearly defined area.
Page 2 (Officer's Report):  <i>“x. £400,000 towards Public Transport provision improvements.”</i>	<i>“x. £400,000 towards Public Transport provision improvements along Stoke Road in Hoo.”</i>  Reason. The wording of the Section 106 doesn't match the specific rationale in the report. The Section 106 needs to be more clearly defined as to what it's purpose is.
Page 2 (Officer's Report):  <i>“xi. £550,000 Off site highways improvements.”</i>	<i>“xi. £550,000 towards off site highways improvements on the Hoo Peninsula, including the A228 Peninsula Way from Ropers Lane Roundabout to Four Elms Roundabout.”</i>  Reason. For the same reasons stated above.

Comments about the Officer's Report.

Page and paragraph:	Comments:
<p>Page 16:</p> <p><b><i>“8 letters of representation from 8 different addresses have been received objecting to the application for the following reasons:</i></b></p> <p><b><i>Loss of agricultural land.</i></b>  <b><i>Concerns in relation to drainage, surface water and flooding in surrounding fields.</i></b>  <b><i>Impact on existing infrastructure e.g. Doctors, schools and hospital. Impact on existing road infrastructure.</i></b>  <b><i>Lack of public transport.</i></b>  <b><i>Increase in crime in the surrounding area.</i></b>  <b><i>Impact of the proposal on listed structures such as pill boxes and Hoo Stop Line.”</i></b></p>	<p>The proposed development is one of the smaller applications currently live in Hoo. Therefore, since the application was submitted to the Local Planning Authority (LPA), I have advised local residents not to submit hundreds of objections to the application, in order for limited Officer resources to be spent on scrutinising proposals around Hoo and Chattenden, rather than processing representations (including uploading them onto the portal and logging them).</p> <p>Members shouldn't conflate the small number of objections as “acceptance” by the local community of the proposal. I refer members to the 2023 Local Election where my two ward colleagues and I were elected with a mandate of around 70% and 2,300 votes. This mandate includes scrutinising proposals and opposing unsustainable development. The key word being unsustainable.</p> <p>Planning applications are not referendums, as explained by Planning Aid England: <b><i>“Local opposition or support for a proposal is not in itself a ground for refusing or granting planning permission.”</i></b> One well written objection demonstrating conflict with planning policy or/and including numerous material considerations, carries more weight than one thousand objections covering the same point/s.</p>
<p>Page 18:</p> <p><b><i>“In the surrounding area, there are a number of sites to the west that are currently under construction or have been completed. On the northern side of Stoke Road there is the Esquire development on the former Street Farm site (50 units) and to the East of that the Jones Homes development (65 dwellings) and to the south side of Stoke Road and west of the application site are two sites currently being developed by Wimpey Homes for a total of 327 dwellings. In addition to the west directly adjacent to the site, south of Stoke Road and Yew Tree Lodge 100 homes have been granted outline permission, with a reserved matters application currently submitted under reference MC/24/2403. As a result of these developments, there have been some improvements to Stoke Road and footpaths linking the sites to the main village centre. Those applications were also the subject of S106 agreements to secure contributions towards improvements to local infrastructure including Health, Education, Open space, Play facilities, Community facilities and Sport amongst others.”</i></b></p>	<p>The report lists developments with planning permission totalling 542 new properties along Stoke Road in Hoo. This doesn't take into account an incoming planning application for 75 new properties opposite Yew Tree Lodge (on Stoke Road). The applicant, Esquire Developments, has ambitions to bring forward approximately 330 new properties (including the 134 new properties as part of this application) in this location, as stated in their representation to the Regulation 18 Local Plan consultation.</p> <p>If you add everything together, this totals 947 new properties. This is equivalent to the village of High Halstow (around 800 properties) being built along Stoke Road in Hoo. High Halstow has a village shop, a village pub and a primary school. None of these or equivalent has been put in place along Stoke Road or within Hoo to accommodate this unsustainable growth.</p> <p>With regards to “some improvements to Stoke Road”, the only improvements to footpaths linking the sites to the main village centre has been a small stretch between Yew Tree Lodge and Thomas Aveling Road (east). The section of Stoke Road between the centre of the village and Thomas Aveling Road (east) has not received any significant improvements and problems currently exist with the footpath in many places.</p> <p><b>This is one of the reasons why I am asking the Planning Committee to defer the decision to undertake a site visit, so members can obtain this visual and in-person information of Stoke Road.</b></p>
<p>Page 19:</p> <p><b><i>“The site is also identified as being part of the ‘Hoo Peninsula Farmland’ designation within the Medway Landscape Character Assessment (chapter 11). Whilst the site is not used for arable farming, the landscape forms part of a wider area of either flat or undulating open</i></b></p>	<p>This is not correct.</p> <p>The vast majority of the development site is currently used for arable farming. This includes Parcel A, Parcel B and half of Parcel C. The only part of the development site that isn't arable farmland is the former Sturdee Club site and playing field - this makes up the other half of Parcel C.</p>

<p><i>farmland with large open fields, has little sense of enclosure, forms part of extensive views across the landscape and is bounded by mixed hedgerow and fencing. The objective of such supporting policy is to encourage the strengthening of the qualities of the area and resist suburbanisation to villages and small settlements. In addition, the guidance also seeks to protect separation, rural character and the openness of countryside between villages.”</i></p>	
<p>Page 19/20:</p> <p><i>“Paragraph 11(d) states that where there are no relevant Development Plan policies or the policies are out of date, to grant planning permission unless the policies in the NPPF provides a strong reason for refusing or where the adverse impacts of doing would outweigh the benefits. In relation to whether the policies in the Development Plan are out of date, Footnote 8 of the NPPF states that for applications involving the provision of housing, this would include where the local planning authority cannot demonstrate a five-year supply of deliverable housing sites (with the appropriate buffer, as set out in paragraph 72), or where the Housing Delivery Test indicates that the delivery of housing was substantially below (less than 75% of) the housing requirement over the previous three years. The latest Housing delivery test results show the Council has provided 72% of its housing need and thus the presumption in favour of sustainable development applies. There is therefore a significant need for new housing in the Medway Area.”</i></p>	<p>The key word here is sustainable. A general presumption in favour of development doesn't exist. Where the adverse impacts (including pressures on the existing community) of granting consent would outweigh the benefits, the application should be refused. The Local Planning Authority (LPA) is currently in stronger position than when the Taylor Wimpey application for 475 houses in-between Hoo and Chattenden was refused and the appeal by the applicant was dismissed by the Planning Inspector in 2016. Hoo has since become a more unsustainable location.</p>
<p>Page 20:</p> <p><i>“The NHP was made in September 2024, and it is therefore the most-up-date Development Plan document. The NHP does not allocate sites for housing or employment outside of the existing village boundary. However, Policy H001 supports employment development subject to sites having adequate and safe access to a highway with sufficient capacity and there being no adverse impacts. Similarly, policy H004 of the NHP is supportive of new housing development coming forward on sites provided that they do not significantly affect the amenities of existing residents, the historic environment (in line with Policy H007), the landscape and natural environment (in line with Policy H008) and delivers a range of housing such as affordable housing and older peoples housing in order to meet local needs.”</i></p>	<p>This is not correct.</p> <p>First and foremost, paragraph 1 of Policy H001 of the Hoo &amp; Chattenden Neighbourhood Plan only supports employment development on brownfield sites within or adjacent to the existing settlement boundary or other existing brownfield employment sites in the locality:</p> <p><i>“Employment development is supported in principle and appropriately according to location through:</i></p> <ul style="list-style-type: none"> <li><i>a. redevelopment of brownfield sites within or adjacent to the built settlements;</i></li> <li><i>b. redevelopment or improvement of existing employment sites.”</i></li> </ul> <p>The application site is not a brownfield site and the Officer's Report doesn't make any reference to the brownfield requirement for employment use.</p> <p>The proposed development, particularly the employment units on the eastern part of Parcel C (which is currently greenfield farmland), is clearly contrary to the Hoo &amp; Chattenden Neighbourhood Plan.</p>
<p>Page 22:</p> <p><i>“Supported by paragraphs 63 and 65 of the NPPF, Policy H10 of the Local Plan supports a range and mix of house types and sizes where the site is over 0.5ha or 1ha (depending on if rural or urban setting) and the principle of development is acceptable. Policy H3 of the Local Plan also requires a proportion (minimum 25%) of residential developments to be affordable housing where there is an identified need and where the development is of sustainable scale. Policy H004 of the NHP also supports the delivery of affordable housing and states that new development should reflect local housing need.”</i></p>	<p>The proposed development is being brought forward in advance of the emerging new Local Plan. I understand the new Local Plan will have a requirement for 30% “Affordable Housing” in rural locations such as Hoo and the Hoo Peninsula. Therefore, if the development site is deemed sustainable as part of the new Local Plan (with the accompanying infrastructure), the community will lose out on 5% “Affordable Housing” by determining the proposal now.</p> <p>There's no mention in the report that local people (in Hoo) will have first refusal for the “affordable homes”. Being a rural community where house prices are higher than urban areas, local residents should have first refusal.</p>

<p>Page 25:</p> <p><b><i>“Policy H0011 of the NHP advises that proposals for large developments should include layouts that prioritise safe, active travel and sustainable forms of transport movement that create good linkages, provide secure and covered cycle storage, electric vehicle charge points and adequate parking provision to accommodate modern vehicles. Policy H006 requires new developments to link to surrounding paths and facilities, including public transport, and create good linkages within the site.”</i></b></p>	<p>Active Travel England (ATE) hasn’t been consulted on the planning application as a Statutory Consultee. ATE will usually appraise the proposal and recommend refusing the application or approving the application. ATE will also usually include suggested conditions and alterations to the proposals in the interests of promoting active travel. Although this planning application is for under 150 units (a trigger for consulting ATE), the application does concern an area greater than five hectares (another trigger for consulting ATE).</p> <p><b>As well as deferring the decision in order to undertake a site visit, ATE should also be consulted on the application and a refreshed/updated Officer’s Report should be presented to the next available Planning Committee meeting. The input from ATE may change the planning balance and material considerations for members.</b></p>
<p>Page 25:</p> <p><b><i>“Stoke Road is a two-way single carriageway road that runs along the northern boundary of parcels A and C. The road is approximately 6 metres wide adjacent to parcel A and B and widens to approximately 7 metres in proximity to parcel C. Stoke Road is subject to a 30mph speed limit along the site frontage up to a point 35m west of the Ropers Lane roundabout. From here the speed limit increases both east along Stoke Road and north along Ropers Lane to 50mph. The Applicant proposes to extend the 30mph zone to the eastern approach to the Ropers Lane roundabout, which is intended to reduce speeds passing the site and will be dealt with separately via a S278.”</i></b></p>	<p>The reduction in speed limits on Stoke Road and Ropers Lane will have an impact on the commercial/industrial businesses at Kingsnorth – including reducing efficiency and transit times. This is contrary to policy H001 of the Hoo &amp; Chattenden Neighbourhood Plan as there is an adverse impact on neighbouring employment sites. The access road at the eastern end of Parcel C should be removed, along with the business units, because this is extending the built-up area beyond the village entrance off the roundabout.</p>
<p>Page 25:</p> <p><b><i>“The closest bus stops are located on Stoke Road adjacent to Sturdee Cottages, approximately 50-150m from each parcel, additional bus stops can be accessed from the junction of Stoke Road, Bells Lane and the Main Road approximately 0.5 miles or a 14-minute walk from the furthest parcel of land. From these stops, five bus routes can be accessed.”</i></b></p>	<p>This is not correct.</p> <p>The only bus stops located on Stoke Road between the centre of Hoo and the roundabout are the ones opposite the proposed development. These bus stops only serve the number 6/10 school bus, they are not bus stops for the general public or 191 service that runs through Hoo. This means at present, new residents would have to walk for around 20 minutes from the new development to the centre of Hoo. I have provided an appraisal demonstrating the walking times from each Parcel of development. The proposal is not sustainable in 15-minute neighbourhood terms. New residents are unlikely to walk to reach services meeting their daily needs. They are also unlikely to walk to the centre of Hoo to catch a bus.</p> <p>Highways Officers made the following comments on the proposed development (Response to Nov Highway Comments 07.01.25):</p> <p><b><i>“Due to the inaccessibility of the site, it is considered that a contribution (or alternative mitigation towards sustainable transport) is required to make the development acceptable in planning terms. Parcel C in particular is well beyond a reasonable expected walking distance of a bus service (excluding the single school bus service 6, which is clearly insufficient provision for a development of this size and location).”</i></b></p>
<p>Page 26:</p> <p><b><i>“A £400,000 contribution has been agreed to provide bus stop improvements and a more regular bus service along Stoke Road adjacent to the three parcels of land. Further improvements to the existing bus routes on the peninsula are being planned through the Councils new Local Plan and</i></b></p>	<p>A similar contribution in the region of £800,000 was secured for a planning application in Cliffe Woods. The difference between that application and this application is Cliffe Woods is already served by a bus route and the £800,000 compliments this existing service. With this application, no bus route currently exists along Stoke Road and therefore the starting position in sustainability terms is much worse. Although I agree with the ambition of a bus</p>

<p><i>in discussion with existing and proposed businesses at Kingsnorth.”</i></p>	<p>route serving Stoke Road and nearby Kingsnorth, I have concerns with how this will impact existing services and the absence of a commitment by Arriva Buses.</p> <p><b>Arriva Buses has not provided a representation to the planning application confirming their commitment to provide a bus service along Stoke Road. Another reason for deferring the application is so we can receive representation and confirmation from Arriva Buses before granting consent for the development. Also, bus services are subsidised by Medway Council and therefore a commitment from the Council is also required.</b></p> <p>Also, Stoke Road is going to need more bus stops located along it as well as a timetable. There is no information about this as part of this planning application. For example, I believe there should be a bus stop outside Yew Tree Lodge (there’s plenty of room for one).</p> <p>I’m concerned with the following comments about the proposed development made by Highways Officers (Response to Nov Highway Comments 07.01.25):</p> <p><b>“The contribution figure has been provided by Arriva buses and reflects the expected cost of diverting an existing service to offshoot hourly to serve Stoke Road.”</b></p> <p>By ofshooting the existing 191 service from the centre of Hoo and along Stoke Road, on an hourly basis, will make existing development in Hoo more unsustainable. This will mean removing bus provision from a significant existing part of the community.</p>
<p>Page 29:</p> <p><b>“Overall, it is considered that the play space provision and open space that is incorporated within this scheme work alongside the adjacent approved schemes and connect together and links the parcels in a sympathetic way to the surrounding footpaths. Subject to a condition requiring the submission of detailed plans in relation to the proposed play space provision no objection is raised in relation to Policy BNE2 of the Local Plan along with Paragraph 96, 98 and 135 (f) of the NPPF.”</b></p>	<p>The applicant did propose a Multi Use Games Area (MUGA) as part of the consultation documentation presented to local residents. The MUGA has since been removed from the plans. The proposed development also doesn’t include any allotment provision. There is adequate room on the development site to include the MUGA and some allotments.</p> <p><b>Another reasons for deferring the decision is for the applicant to carry out a minor design amendment to include a MUGA and an allotment site.</b></p>
<p>Page 30:</p> <p><b>“With regard to biodiversity, it should be noted that this planning application was submitted before the mandatory Biodiversity Net Gain (BNG) requirement legislation. However, the application is supported by a Biodiversity net gain design stage report which states that the proposed habitat creation/enhancement with suitable post development management could provide an increase of 35.06 units of biodiversity on site, alongside plans to secure 5.58 units of biodiversity off site combined delivering an increase in biodiversity. The measures that are seen to provide these are in the provision of enhancements to open space areas for grassland habitats, increase in tree numbers and improvements to hedgerows present on the site. There are also other potential enhancements such as bat bricks and bird boxes.”</b></p>	<p>The application is being determined in advance of the new emerging Local Plan where there would be minimum requirements for biodiversity net gain. A new application submitted today would also have these requirements. It is accepted there will be biodiversity net gain regardless. The 5.58 units of biodiversity off site should be “spent” or used on the nearby Hoo Wetlands/Kingsnorth Quarry project or Deangate Ridge Country Park.</p>
<p>Page 31:</p> <p><b>“As a result of the sites location close to waterbodies great crested newts may be on site. To mitigate against this the applicant has submitted Natural England’s conservation payment certificate. A bird survey highlighted that the site provides breeding habitat for a range of common and</b></p>	<p>The payment certificate is a sum of money paid to Natural England to create habitat for great crested newts. It’s not clear where this habitat will be created. The habitat should be created as close to the development site as possible, or in the Hoo area or on the Hoo Peninsula. The payment essentially gives the applicant licence to potentially destroy great crested newts themselves or their habitat.</p>

<p><b>widespread birds, as well as a small number of red and amber listed species.”</b></p>	<p>Habitat recreation or enhancement should be carried out as close to the development site as possible to mitigate the birds who will be impacted from this development. Some of which are red and amber listed species.</p>
<p>Page 37/38:</p> <p><b>“The site is within a walkable distance from the Hoo St Werburgh village centre and local services, the proposal also features the provision of a café community centre to be located on site for the use of residents of Hoo. The design demonstrates the ability to link the proposed scheme to adjacent schemes, footpaths and the proposed Hoo Wetlands and Cookham Community Parklands to the South of site.”</b></p>	<p>This paragraph contradicts the comments made by Highways Officers (mentioned above). The development site, particularly Parcel C, is isolated development and far away from the centre of Hoo in terms of walking distance. Without a bus service actually being in place, there are no realistic sustainable modes of transport serving the development. Stoke Road has not had a Road Safety Audit with regards to pedestrian, cyclist and motorist safety and transit – it is currently unattractive to cyclists as well as pedestrians.</p>
<p>Page 38:</p> <p><b>“Although the proposal will result in the loss of the former sports facilities, it is considered that the provision of the proposed café community centre, nursery, play facilities and open space provisions across all three parcels, would result in the delivery of better provision in terms of uses, quality and size across the three parcels of land. It is considered that their delivery would outweigh the loss of the former use and as such no objection is raised in regard to policy L3 or Paragraph 104 of the NPPF. In addition, a contribution would be secured to support open space and formal outdoor sports provision and improvements in the area.”</b></p>	<p>Over recent years, the community of Hoo and Chattenden has lost multiple sports playing fields including the site off Elm Avenue (Chattenden) and the BAE Club at the top of Bells Lane. Hoo does not currently have a publicly accessible sports playing field. You have to be a member of Hoo Village Institute to use their private playing field or pay for the hire of the playing fields at the Hundred of Hoo Academy. The sports playing field at Deangate Ridge is outside the village envelope and children and adults have to cross a dangerous dual carriageway at the top of the village to reach Deangate Ridge.</p>

**Summary of the reasons for a deferral.**

1. I am asking the Planning Committee to defer the decision to undertake a site visit, so members can obtain visual and in-person information of Stoke Road and how each parcel (Parcel A, Parcel B and Parcel C) relate to one another and the existing built-up/village envelope of Hoo.
2. Within this period, Active Travel England (ATE) should also be consulted on the application and a refreshed/updated Officer’s Report should be presented to the next available Planning Committee meeting. The input from ATE may change the planning balance and material considerations for members. ATE may recommend refusal or approval, as well as additional conditions or changes to existing conditions. They may also recommend changes to the current design.
3. Within this period, Arriva Buses or/and Medway Council Officers should provide a representation detailing their commitment to provide a bus service along Stoke Road. This should include a plan for additional bus stops, the route and a timetable (in detailed or outline/in principle form). Confirmation is needed concerning how this new route will operate alongside the 191 service and if there will be any impact on the 191 service for existing residents.
4. Within this period, the applicant should carry out a minor design amendment to reintroduce the promised Multi Use Games Area (MUGA) and a site for some allotments on the development site plans.

Best wishes and kind regards,

*Michael Pearce*

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