

Planning Committee – Supplementary agenda no.1

A meeting of the Planning Committee will be held on:

Date: 12 March 2025

Time: 6.30pm

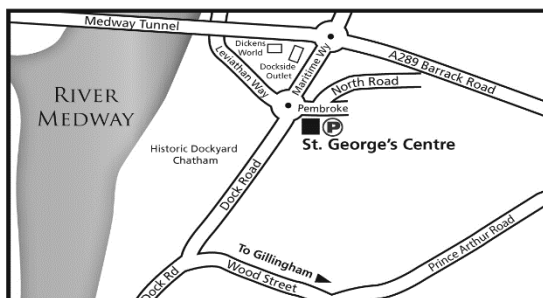
Venue: St George's Centre, Pembroke Road, Chatham Maritime, Chatham
ME4 4UH

Items

- 9 Additional Information - Supplementary Agenda Advice Sheet (Pages 3 - 40)

For further information please contact Julie Francis-Beard, Democratic Services Officer on Telephone: 01634 332012 or Email: democratic.services@medway.gov.uk

Date: 12 March 2025



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| Medway Council |
| Planning Committee – 12 March 2025 |
| Supplementary Agenda Advice Sheet |

Page 18 MC/23/2857 Land at the Former Sturdee Club and land at Stoke Road, Hoo St Werburgh ME3 9BJ

It has become apparent that Active Travel England have not been consulted and whilst under the 150 dwelling threshold the site is above the 5-hectare threshold and a consultation should have been undertaken.

This consultation has now been undertaken and a change to the recommendation is made below.

In addition, a number of conditions have been altered to improve clarity and enforceability, and one condition has been deleted as it was a duplicate.

Recommendation – Approval Subject to:

- A. The expiry of the consultation with Active Travel England; and
- B. The imposition of any additional conditions recommended as a result of a response from Active Travel England and no unresolvable objections being received; and
- C. The applicants entering into agreement under Section 106 of the Town and Country Planning Act to secure:
 - i. A minimum of 25% affordable housing.
 - ii. £28,303.48 to improve equipment and facilities at Hoo Library.
 - iii. £41,726.26 towards improvements at Hoo Leisure Centre.
 - iv. £29,656.88 for the provision, improvement and promotion of waste and recycling services.
 - v. £150,000 towards improvements to open space and outdoor formal sport within the Hoo area.
 - vi. £489,169.09 for primary provision within 2 miles of development site or SEND education within Medway.

- vii. £387,585.48 for secondary provision or SEND within Medway.
- viii. £95,201.64 health contribution towards extension/refurbishment or upgrading of existing proactive premises within the vicinity or contribution to a new facility.
- ix. £10,050 towards public rights of way improvements within the vicinity of the site.
- x. £400,000 towards Public Transport provision improvements.
- xi. £550,000 Off site highways improvements.
- xii. £93,800 towards travel plan.
- xiii. £32,830.00 towards public realm improvements in Hoo centre or within the vicinity of the site.
- xiv. £5,000 to contribute to the overall interpretation of the stop line and propose that their interpretation is undertaken in coordination with the Whose Hoo Strategy.
- xv. £43,988.18 towards strategic measures in respect of the coastal North Kent Special Protection Area.
- xvi. Meeting the Council's costs.

D. And the following conditions:

- 1 The development hereby permitted shall be begun before the expiration of three years from the date of this permission.

Reason: To comply with Section 91 of the Town and Country Planning Act 1990 (as amended).

- 2 The development hereby permitted shall be carried out in accordance with the following approved plans:

Received 22 December 2023:

Indicative access arrangement sheet (107737-PEF-XX-XX-DR-C-000001-P06)

Indicative access arrangement sheet (107737-PEF-XX-XX-DR-C-000003-P04)

Indicative access arrangement sheet (107737-PEF-XX-XX-DR-C-000002-P06)

Demolition plan (30157A_03)

Proposed Plans and Elevations House Type AH 1B - 2B Maisonette Terrace (30157A/30)

Proposed Plans and Elevations House Type AH 1B - 3B Maisonette Terrace (30157A/31)
Proposed Plans and Elevations House Type AH 2B Terrace (30157A/32)
Proposed Plans and Elevations House Type AH 3B Semi-Detached (30157A/33)
Proposed Plans and Elevations House Type AH 3B Terrace (30157A/34)
Proposed Plans and Elevations House Type BG-A (30157A/35)
Proposed Plans and Elevations House Type BG-B (30157A/36)
Proposed Plans and Elevations House Type BG-C (30157A/37)
Proposed Plans and Elevations House Type 2A Semi-Detached (30157A/38)
Proposed Plans and Elevations House Type 2A Terrace (30157A/39)
Proposed Plans and Elevations House Type 3A (30157A/40)
Proposed Plans and Elevations House Type 3C (30157A/41)
Proposed Plans and Elevations House Type 3C (30157A/42)
Proposed Plans and Elevations House Type 3C Semi Detached (30157A/43)
Proposed Plans and Elevations House Type 3D Attached Garage (30157A/44)
Proposed Plans and Elevations House Type 3D Detached Garage (30157A/45)
Proposed Plans and Elevations House Type 3B (30157A/46)
Proposed Plans and Elevations House Type 3E (30157A/47)
Proposed Plans and Elevations House Type 4D (30157A/48)
Proposed Plans and Elevations House Type 4A (30157A/49)
Proposed Plans and Elevations House Type 4B (30157A/50)
Proposed Plans and Elevations House Type 4C (30157A/51)
Proposed Plans and Elevations House Type 5A (30157A/52)
Proposed Plans and Elevations House Type 5B (30157A/53)
Proposed Plans and Elevations House Type AH 1B-2B-3B Maisonette Terrace (30157A/54)
Proposed Plans and Elevations House Type AH 1B-2B-3B Terrace (30157A/55)
Proposed Plans and Elevations Commercial Block A & B (30157A/56)
Proposed Plans and Elevations Commercial Block C (30157A/57)
Proposed Plans and Elevations Cafe & Community Hub (30157A/58)
Proposed Plans and Elevations Nursery (30157A/59)
Proposed Garage Variations (30157A/60)
Drainage layout Parcel A (2305960-D006 - REV P2)
Drainage layout Parcel B (2305960-D007 - REV P2)
Drainage layout Parcel C (2305960-D008)
Drainage layout parcel C (2305960 - D009 P3)
Engineering layout Parcel A (2305960-D002 - REV P2)
Engineering layout Parcel B (2305960-D003 - REV P2)
Engineering layout Parcel C (2305960-D004 - REV P2)
Engineering layout Parcel C (2305960-D005 - REV P2)

Received 08 January 2025:

Proposed site layout plan (30157A_10B)
Proposed coloured site plan (30157A_11B)
Proposed site diagrams - Parking (30157A_12B)
Proposed site diagrams - refuse (30157A_13B)
Proposed site diagrams - fire (30157A_14B)
Proposed site diagrams - house type mix (30157A_15B)
Proposed site diagrams - boundary (30157A_16B)
Proposed site diagrams - site use (30157A_17B)
Proposed site diagrams - movement (30157A_18B)
Proposed site diagrams - air source heat pump (30157A_19B)
Cycle store (30157A_61A)

Site Wide Landscape Masterplan (6515-LLB-XX-XX-DR-L-0001-S4-P05)
Landscape masterplan parcel A (6515-LLB-XX-XX-DR-L-0002-S4-P05)
Landscape masterplan parcel B (6515-LLB-XX-XX-DR-L-0003-S4-P05)
Landscape masterplan parcel C (6515-LLB-XX-XX-DR-L-0004-S4-P05)

Received 10 February 2025:
Proposed commercial cycle and bin store (30157A / 61A)

Reason: For the avoidance of doubt and in the interests of proper planning.

3 Prior to the commencement of development a Phasing Plan shall be submitted to and approved in writing by the Local Planning Authority. The Phasing Plan shall:

- Define the extent of the area of each phase.
- Specify the order and timing of the proposed phases, which shall be shown sequentially starting with Phase 1.
- Specify the order and timing of the delivery of the Nursery; commercial units and the community café, which shall not be included within the last phase.

The development shall be implemented in accordance with the approved Phasing Plan.

Reason: To ensure that the appearance of the development is satisfactory and without prejudice to conditions of visual amenity in the locality, in accordance with Policy BNE1 of the Medway Local Plan 2003.

4 No development above ground floor slab level within each Phase shall take place until details of all materials to be used externally have been submitted to and approved in writing by the Local Planning Authority, and the development shall be carried out in accordance with the approved details.

Reason: To ensure that the appearance of the development is satisfactory and without prejudice to conditions of visual amenity in the locality, in accordance with Policy BNE1 of the Medway Local Plan 2003.

- 5 No dwelling shall be occupied within each Phase until a plan indicating the positions, design, materials and type of boundary treatment to be erected has been submitted to and approved in writing by the Local Planning Authority. The boundary treatment for the relevant dwelling shall be completed in accordance with the approved details before that dwelling is occupied and shall thereafter be retained.

Reason: To ensure that the appearance of the development is satisfactory and without prejudice to conditions of visual amenity in the locality, in accordance with Policy BNE1 of the Medway Local Plan 2003.

- 6 Prior to the commencement of development, an investigation and risk assessment, in addition to any assessment provided with the planning application, must be completed for each Phase in accordance with a scheme to assess the nature and extent of any contamination on the site, including risks to groundwater, whether or not it originates on the site. The scheme shall be submitted to and approved in writing by the Local Planning Authority prior to commencement of the development. The investigation and risk assessment must be undertaken by competent persons and a written report of the findings must be produced. The written report shall be submitted to and approved by the Local Planning Authority prior to the commencement of development. The report of the findings must include:

- (i) a survey of the extent, scale and nature of contamination;
- (ii) an assessment of the potential risks to:
 - human health
 - property (existing or proposed) including buildings, crops, livestock, pets, woodland and service lines and pipes.
 - adjoining land,
 - groundwaters and surface waters,
 - ecological systems,
 - archaeological sites and ancient monuments;
- (iii) an appraisal of remedial options, and proposal of the preferred option(s).

This must be conducted in accordance with DEFRA and the Environment Agency's 'Land Contamination Risk Management document (LCRM)'.

Reason: To ensure that the development is undertaken in a manner which acknowledges interests of amenity and safety in accordance with Policy BNE23 of the Medway Local Plan 2003.

- 7 If contamination is identified under Condition 6 within a phase of the development a detailed remediation scheme to bring the site to a condition suitable for the intended use by removing unacceptable risks to human health, buildings and other property and the natural and historical environment must be prepared, and submitted to and approved in writing by the Local Planning Authority prior to commencement of the development within that Phase. The scheme must include all works to be undertaken, proposed remediation objectives and remediation criteria, timetable of works and site management procedures. The scheme must ensure that the site will not qualify as contaminated land under Part 2A of the Environmental Protection Act 1990 in relation to the intended use of the land after remediation.

Reason: To ensure that the development is undertaken in a manner which acknowledges interests of amenity and safety in accordance with Policy BNE23 of the Medway Local Plan 2003.

- 8 The applicable remediation scheme approved in accordance with Condition 7 for each Phase must be carried out in accordance with its terms prior to the commencement of any development within that phase (other than development required to enable the remediation process to be implemented) unless otherwise agreed in writing by the Local Planning Authority. The Local Planning Authority must be given not less than two weeks written notification prior to the commencement of the remediation scheme works.

Following completion of the measures identified in the approved remediation scheme, a verification report that demonstrates the effectiveness of the remediation carried out within that Phase must be produced and submitted to and approved in writing by the Local Planning Authority prior to the bringing into use of the development within that phase.

Reason: To ensure that the development is undertaken in a manner which acknowledges interests of amenity and safety in accordance with Policy BNE23 of the Medway Local Plan 2003.

- 9 In the event that contamination is found at any time when carrying out the approved development that was not previously identified it must be reported in writing immediately to the Local Planning Authority. An investigation and risk assessment must be undertaken in accordance with the requirements of condition 6, and where remediation is necessary a remediation scheme must be prepared in accordance with the requirements of condition 7, which is subject to the prior approval in writing of the Local Planning Authority.

Following completion of the measures identified in the approved remediation scheme a verification report providing details of the data that will be collected in order to demonstrate that the works set out in

condition 7 are complete and identifying any requirements for longer-term monitoring of pollutant linkages, maintenance and arrangements for contingency action must be prepared, which is subject to the approval in writing of the Local Planning Authority in accordance with condition 7.

Reason: To ensure that the development is undertaken in a manner which acknowledges interests of amenity and safety in accordance with Policy BNE23 of the Medway Local Plan 2003.

- 10 Prior to the commencement of the development within each Phase a Construction Environmental Management Plan (CEMP) and Construction Traffic Management Plan shall be submitted to and approved in writing by the Local Planning Authority. The Construction Environmental Management Plan shall include amongst other matters details of: hours of construction working; measures to control noise affecting nearby residents; wheel cleaning/chassis cleaning facilities; dust control measures; pollution incident control and site contact details in case of complaints. The Construction Traffic Management Plan shall include as a minimum construction phasing, construction routing plans, permitted construction traffic arrival and departure times. The construction works shall thereafter be carried out at all times in accordance with the approved Plans, unless any variations are otherwise first submitted to and approved in writing by the Local Planning Authority.

Reason: In order to mitigate any adverse impact from the development on the on the local and wider strategic network and to minimise the impact of the construction period on the amenities of local residents, the countryside, wildlife and habitat and with regard to Policies BNE2, BNE37 and BNE39 of the Medway Local Plan 2003.

- 11 No development shall take place within each Phase until an Air Quality Emissions Mitigation Statement for that phase has been submitted to and approved in writing by the Local Planning Authority. The Statement shall be prepared in accordance with the Medway Air Quality Planning Guidance and shall include full details of the measures that will be implemented as part of the development to mitigate the air quality impacts identified in the approved Air Quality Assessment dated 14 December 2023. The total monetary value of the mitigation to be provided shall be demonstrated to be equivalent to, or greater than, the total damage cost values calculated as part of the approved Air Quality Assessment. The development within that phase shall thereafter be implemented, and maintained, entirely in accordance with the measures set out in the approved Mitigation Statement for that phase.

Reason: Required prior to commencement of development to ensure no long term detrimental harm to conditions of amenity in accordance with Policies BNE2 and BNE24 of the Medway Local Plan 2003.

- 12 Prior to the commencement of the development within each Phase hereby permitted, a scheme for protecting the proposed development from noise that implements the measures described in the noise assessment reference 230702/2 dated 7 December 2023, shall be submitted and approved in writing by the Local Planning Authority. The scheme shall include details of acoustic protection sufficient to ensure internal noise levels (LAeq,T) no greater than 30dB in bedrooms and 35dB in living rooms with windows closed and a maximum noise level (LAmax) of no more than 45dB(A) with windows closed. Where the internal noise levels will be exceeded with windows open, the scheme shall incorporate appropriate acoustically screened mechanical ventilation. The scheme shall include details of acoustic protection sufficient to ensure amenity/garden noise levels of not more than 55dB (LAeq,T). All works which form part of the approved scheme shall be completed before any part of the development is occupied and shall thereafter be maintained in accordance with the approved details.

Reason: To safeguard conditions amenity in accordance with Policy BNE2 of the Medway Local Plan 2003.

- 13 Prior to the installation of any extraction equipment within the proposed café/community facility a scheme for the extraction and treatment of cooking fumes, including details for the control of noise and vibration from the system, shall be submitted and approved in writing by the Local Planning Authority. Noise from the extraction system (LAeq,T) shall be at least 10dB(A) below the background noise level (LA90,T) at the nearest residential facade, when assessed in accordance with BS4142:2014. The approved scheme shall be implemented before that part of the development to which it relates is brought into use and shall thereafter be maintained in accordance with the approved details.

Reason: To safeguard conditions amenity in accordance with Policy BNE2 of the Medway Local Plan 2003.

- 14 Notwithstanding the provisions of the Town and Country Planning (General Permitted Development) (England) Order 2015 (as amended) (or any order amending, revoking and re-enacting that Order with or without modification) and the Town and Country Planning (Use Classes) Order 1987 (as amended) (or any order amending, revoking and re-enacting that Order with or without modification) the nursery building shall only be used as a children's day nursery under Class E(f).

Reason: To ensure that the nursery/education provision remains on site to provide adequate facilities for the local population and to enable the Local Planning Authority to control any alternative uses due to potential adverse effects on residential amenity and highway safety and with regard to Policies BNE2, CF1, CF2, T1 and T13 of the Medway Local Plan 2003.

- 15 Notwithstanding the provisions of the Town and Country Planning (General Permitted Development) (England) Order 2015 (as amended) (or any order amending, revoking and re-enacting that Order with or without modification) and the Town and Country Planning (Use Classes) Order 1987 (as amended) (or any order amending, revoking and re-enacting that Order with or without modification) the Community Café/Hub shall only be used as such under (Class E(b)/F2(b)).

Reason: To ensure that the community use remains on site to provide adequate facilities for the local population and to enable the Local Planning Authority to control any alternative uses due to potential adverse effects on residential amenity and highway safety and with regard to Policies BNE2, CF1, CF2, T1 and T13 of the Medway Local Plan 2003.

- 16 Prior to the occupation of 50% of the dwellings on parcel C the construction of at least one commercial unit, the community café/hub and nursery shall be completed and ready for occupation/use including all associated works car parking, bicycle sheds, refuse storage, lighting and car parking barriers and landscaping.

Prior to the occupation of 95% of the dwellings on parcel C the remaining commercial units shall be constructed, completed and ready for occupation including all associated works car parking, bicycle sheds, refuse storage, lighting and car parking barriers and landscaping.

Reason: In the interested of sustainability and to ensure that this mixed use development is delivered as proposed and in compliance with paragraphs 85 to 89 of the NPPF.

- 17 Prior to the occupation of any commercial unit hereby permitted, a scheme to minimise the transmission of noise from the use of that premises, shall be submitted to and approved in writing by the Local Planning Authority. Noise from the premises should be controlled, such that the noise rating level (L_{A,r},T_r) emitted from the development shall be at least 10dB below the background noise level (L_{A90,T}) at the nearest residential facade. All measurements shall be defined and derived in accordance with BS4142: 2014. All works which, form part of the approved scheme shall be completed before that commercial unit is occupied and shall thereafter be maintained in accordance with the approved details.

Reason: To ensure no long term detrimental harm to conditions of amenity and vitality of street scene in accordance with Policy BNE2 and R8 of the Medway Local Plan 2003.

- 18 No dwellings within Parcel A shall be occupied until details for the provision of the stop line and pillbox information boards, including appearance, height, content and exact location, and installation

schedule, as well as a programme of maintenance in perpetuity, has been submitted to and approved in writing by the Local Planning Authority. The information boards shall thereafter be provided and maintained in accordance with the approved details.

Reason: In the interests of visual amenity in the locality, in accordance with Local Plan Policy BNE1 and BNE20.

- 19 No development shall commence within a Phase until full details of the areas to be set aside within that phase for public open space, footpaths and equipped play facilities together with the play equipment and surfacing to be provided has been submitted to and approved in writing by the Local Planning Authority. All the public open space, footpaths and play equipment and facilities shall be provided in accordance with the approved scheme of details prior to the first occupation of the residential accommodation within that phase and shall thereafter be retained in accordance with the approved details.

Reason: To ensure the satisfactory provision of play equipment and public open space are in accordance with Policy L4 of the Medway Local Plan 2003.

- 20 No development shall take place within each Phase until a scheme for that phase based on sustainable drainage principles, has been submitted to and approved in writing by the Local Planning Authority in consultation with the Lead Local Flood Authority.

The scheme shall include (where applicable):

- i. Details of the design of the scheme (in conjunction with the landscaping plan where applicable).
- ii. A timetable for its implementation (including phased implementation).
- iii. Operational maintenance and management plan including access requirements for each sustainable drainage component.
- iv. Proposed arrangements for future adoption by any public body, statutory undertaker or management company.

The development within that Phase shall be undertaken in accordance with the applicable agreed scheme.

Reason: To manage surface water during and post construction and for the lifetime of the development as outlined at Paragraph 168 of NPPF.

- 21 Prior to the first occupation of each Phase (or within an agreed implementation schedule) a signed verification report carried out by a qualified drainage engineer (or equivalent) must be submitted to and approved in writing by the Local Planning Authority to confirm that the agreed surface water system within that phase has been constructed as per the applicable agreed scheme and plans. The report shall

include details and locations of critical drainage infrastructure (such as inlets, outlets and control structures) including as built drawings, and an operation and maintenance manual for the unadopted parts of the scheme as constructed.

Reason: This condition is sought in accordance with paragraph 168 of the NPPF to ensure that suitable surface water drainage scheme is designed and fully implemented so as to not increase flood risk onsite or elsewhere.

- 22 No development shall commence within each Phase until details of a Construction Surface Water Management Plan (CSWMP) for that phase detailing how surface water and storm water will be managed on the site during construction (including demolition and site clearance operations) has been submitted to and approved in writing by the Local Planning Authority in consultation with the Lead Local Flood Authority. The approved CSWMP shall be implemented and thereafter managed and maintained in accordance with the approved plan for the duration of construction within that applicable phase.

The approved CSWMP shall include method statements, scaled and dimensioned plans and drawings detailing surface water management proposals to include:

- i. Temporary drainage systems.
- ii. Measures for managing pollution / water quality and protecting controlled waters and watercourses.
- iii. Measures for managing any on or offsite flood risk

The development within that applicable phase shall be undertaken in accordance with the approved details for that phase.

Reason: To manage surface water during and post construction and for the lifetime of the development as outlined at Paragraph 168 of NPPF.

- 23 Notwithstanding the provisions of the Town and Country Planning (General Permitted Development) Order 2015 (or any order amending, revoking and re-enacting that Order with or without modification) all dwellinghouses herein approved shall remain in use as a dwellinghouse falling within Class C3 of the Town and Country Planning (Use Classes) Order 1987 (as amended) (or any order amending, revoking and re-enacting that Order with or without modification) and no change of use shall be carried out unless planning permission has been granted on an application relating thereto.

Reason: To enable the Local Planning Authority to control such development in the interests of amenity, in accordance with Policy BNE2 of the Medway Local Plan 2003.

- 24 Notwithstanding the provisions of the Town and Country Planning (General Permitted Development) Order 2015 (or any order amending, revoking and re-enacting that Order with or without modification) no development shall be carried out within Schedule 2, Part 1 Classes A, AA and B of that Order unless planning permission has been granted on an application relating thereto.

Reason: To enable the Local Planning Authority to control such development in the interests of visual and neighbouring amenity in accordance with Policies BNE1 and BNE2 of the Medway Local Plan 2003.

- 25 The development herein approved shall incorporate the measures to address energy efficiency and climate change as set out within the Climate Change section of the Design and Access Statement (received 22 December 2023). Prior to occupation of any dwelling within each Phase a verification report prepared by a suitably qualified professional shall be submitted to and approved in writing by the Local Planning Authority confirming that all the approved measures applicable to that phase have been implemented.

Reason: In the interests of sustainability and to positively address concerns regarding climate change in accordance with paragraph 159 of the National Planning Policy Framework 2023.

- 26 No development shall take place within each Phase (except as may be agreed in writing by the Local Planning Authority) until the developer has secured for that phase the implementation of a programme of archaeological work in accordance with a written specification and timetable which has first been submitted to and approved in writing by the Local Planning Authority. Development within a phase shall be carried out in accordance with the relevant approved specification for that phase.

Reason: To safeguard the archaeological interest in the site in accordance with Policy BNE21 of the Medway Local Plan 2003.

- 27 Prior to the first occupation of any dwelling within each Phase herein approved, full details of both hard and soft landscape works and any artefacts to be located within the public space and a timetable for implementation for that phase shall be submitted to and approved in writing by the Local Planning Authority.

These details should include.

- i. Plans and information providing details of existing and proposed finished ground levels, means of enclosure, car parking layouts, other vehicle and pedestrian access and circulation areas, all paving and external hard surfacing, lighting, and services (including drainage), tree grilles, minor artefacts, and structures

(seating, refuse receptacles and raised planters). Soft landscape works, including details of planting plans, tree positions, planting build ups, written specifications (including cultivation and other operations associated with grass, tree and planting establishment, aftercare, and maintenance); schedules of plants, noting species, plant sizes, root treatments and proposed numbers/densities where appropriate.

- ii. Details for the design and specification of tree planting to enable healthy establishment at maturity. Information should provide details for the planting environment (including within hard landscape), calculated soil volume, tree support and tie specification, guards and grilles, aeration and irrigation systems, soil build-up information (avoiding the use of tree sand), tree cell systems (to street tree planting environments).

The development within a phase shall be implemented in accordance with the relevant approved details and timetable for that phase and any trees or plants which within 5 years of planting are removed or become seriously damaged or diseased shall be replaced in the next planting season with others of a similar size and species.

Reason: To ensure a satisfactory external appearance and provision for landscaping in accordance with Policies BNE1 and BNE6 of the Medway Local Plan 2003.

- 28 Prior to the first occupation within each Phase herein approved, a landscape management plan for that phase, shall be submitted to and approved in writing by the Local Planning Authority. The Landscape Management Plan shall include long term design objectives, management responsibilities and maintenance schedules for all landscape areas (except for small, privately owned, domestic gardens) for a minimum period of five years and arrangements for implementation. The development within that phase shall thereafter be implemented in accordance with the relevant approved details. Prior to any handover of the maintenance of the public landscape areas to a management company, there must be a site visit involving the LPA, the proposed landscape management company and the developer. The site visit will include a review of the site area proposed to be transferred to the management company and will assess whether the approved landscape plans have been implemented as approved, the condition and maintenance of all planting and what measures are necessary prior to a handover to the management company. The results of the site visit/walk over shall be submitted to and approved in writing by the Local Planning Authority and the agreed requirements in terms of re-planting/maintenance shall be undertaken prior to any hand over to the management company.

Reason: To ensure a satisfactory external appearance and provision for landscaping in accordance with Policies BNE1 and BNE6 of the Medway Local Plan 2003.

- 29 Prior to commencement of works within each Phase (including site clearance) details of a construction environmental management plan (CEMP) and a Landscape and Environmental Management Plan (LEMP) for that phase shall submitted to and approved in writing by the Local Planning Authority.

The CEMP shall contain full details of the measures outlined in section 10 of the Ecological Impact Assessment (EclA) (Native Ecology, December 2023) associated with the planning application and shall include consideration of the following:

- Details of the role of an ecological clerk of works (ECoW) on site for ecologically sensitive work (including demolition and vegetation clearance);
- Details of timing of sensitive works to avoid impacts to wintering and breeding birds;
- Details of where construction exclusion zones are to be established to avoid disturbance to birds on adjacent land;
- Measures to minimise light spill effectively in accordance with ILP/BCT guidance note GN08: 'Bats and Artificial Lighting';
- Measures to relocate reptiles to an onsite, 0.2ha reptile receptor; and
- General measures to avoid impacts to badgers and hedgehogs.

The approved CEMP shall thereafter be adhered to and implemented throughout the construction period for that phase in accordance with the approved details.

The LEMP shall be in accordance with BS42020 Biodiversity to include details of the management for the development within that phase as well as the long term management of the open space and boundary hedging/landscaping, The content of the LEMP shall include the following, as a minimum:

- A plan identifying the extent of the area to be covered by the LEMP, which shall include all of the application site that are not part of private residential properties.
- Ecological trends and constraints on site and wider environmental issues that might influence management and in particular consider the likely effects of climate change.
- Landscape and ecological aims and objectives of the management.
- Appropriate management options for achieving aims and objectives.
- Prescriptions for management actions for each identified habitat and feature covered.

- Preparation of a work schedule (including an annual work plan capable of being rolled forward for the lifetime of the development) with recommendations for periodic review.
- Details of the body or organisation responsible for implementation of the plan and the resources both financial and personnel by which the LEMP will be implemented. This shall include details of the legal and funding mechanism(s) by which the long-term implementation of the plan will be secured post development with the management body(ies) responsible for its delivery.
- Ongoing monitoring and remedial measures including regular review by accredited professionals including setting out (where the results from monitoring show that conservation aims and objectives of the LEMP are not being met) how contingencies and/or remedial action will be identified, agreed and implemented so that the development still delivers the fully functioning landscape and biodiversity objectives of the originally approved scheme.
- Details of community engagement connected with raising awareness of and/or volunteering for the management of retained and created habitats and features on site for biodiversity. To be delivered by the Kent High Weald Partnership, Kent Wildlife Trust or other approved organisation with a minimum of two events per year.

The approved LEMP for that Phase shall thereafter be adhered to and implemented in accordance with the approved details.

Reason: To avoid an offence under the Wildlife and Countryside Act 1981 and with consideration for Species of Principal Importance under the Natural Environment and Rural Communities Act 2006 and to be in accordance with paragraphs 180(c) and 185(b) of the NPPF 2023 which require developments to deliver measurable ecological gains.

- 30 Prior to the installation of any external lighting within each Phase on the site including on any buildings, details of such lighting shall be submitted to and approved in writing by the Local Planning Authority. Details shall include height, position, external appearance, any shielding, light intensity, colour, spillage (such as light contour or lux level plans showing the existing and proposed levels) and hours of use] together with a report to demonstrate its effect on the landscaping of the site (including an overlay of the proposed lighting onto the site landscaping plans), the rural landscape, nearby residential properties, bats (including reference to the recommendations of the Bat Conservation Trust) and of how this effect has been minimised. Any external lighting within a phase shall be implemented in accordance with the relevant approved details for that phase.

Reason: In order to limit the impact of the lighting on the landscaping of the site, the surrounding landscape, nearby residents and wildlife and

with regard to Policies BNE1, BNE2, BNE5, and BNE39 of the Medway Local Plan 2003.

- 31 Prior to the first occupation within each Phase, refuse storage arrangements as set out within the proposed refuse Strategy 30157A_13A (received 28 October 2024) shall be implemented on site in relation to the phase or sub-phase to which it relates and shall be retained thereafter.

Reason: To ensure the provision and permanent retention of refuse storage in accordance with Policy BNE2 of the Medway Local Plan 2003.

- 32 The Public Rights of Way (PROW) located on the western parcel of the application site shall be kept open and accessible to all users throughout the construction of the development.

Reason: To ensure that the PROW network remains available for public use continuously throughout the course of development in accordance with paragraph 105 of the NPPF.

- 33 Prior to first occupation of any dwelling the area shown on the approved plans as vehicle parking spaces for that dwelling shall be provided, surfaced and drained. Thereafter it shall be kept available for such use and no permanent development, whether or not permitted by the Town and Country Planning (General Permitted Development) Order 2015 (or any order amending, revoking or re-enacting that Order) shall be carried out on the land so shown or in such a position as to preclude vehicular access to this reserved parking space and garaging.

Reason: Development without provision of adequate accommodation for the parking or garaging of vehicles is likely to lead to hazardous on-street parking and in accordance with Policies T1 and T13 of the Medway Local Plan 2003.

- 34 The approved carports shall not be enclosed, and no other permanent development shall take place, within or to the car ports whether or not permitted by the Town and Country Planning (General Permitted Development) Order 2015 (or any order amending, revoking or reenacting that Order). The car port parking spaces shall remain available for parking.

Reason: Development without provision of adequate accommodation for the parking of vehicles is likely to lead to hazardous on-street parking and in accordance with Policy T13 of the Medway Local Plan 2003.

- 35 Prior to occupation of each Phase the final details of the Travel Plan for that Phase have been submitted to and approved in writing by the

Local Planning Authority. The final travel plan shall be implemented in accordance with the approved details and timetable and thereafter be complied with as long as any part of the development is occupied.

Reason: To ensure the sustainable transport objective related to the development of this site and to reduce potential impact on the surrounding area in accordance with Policy T14 of the Medway Local Plan 2003.

Representations

Three letters of representation have been received from Cllr Pearce. These are attached in full to this Supplementary Report.

One letter of representation has been received from the applicant. This is attached in full to this Supplementary Report.

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Councillor Michael Pearce

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Monday 3rd 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 3rd 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

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Councillor Michael Pearce

17 Grandsire Gardens

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Monday 3rd March 2025.

Local Planning Authority (LPA)

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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



Councillor Michael Pearce

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Monday 3rd March 2025.

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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 potential **Section 106 Developer Contributions** 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”.*

If the Local Planning Authority (LPA) is minded to approve this planning application, there must be appropriate Section 106 Developer Contributions for the local community based on the “Medway Guide to Developer Contributions and Obligations” - published in May 2018 and updated in April 2024. This guide states all Section 106 agreements should satisfy the following test: (1) it must be necessary to make the proposed development acceptable in planning terms, (2) it is directly related to the proposed development and (3) it is fairly and reasonably related in scale and kind to the proposed development.

This specific representation, concerning the potential Section 106 Developer Contributions, neither supports or objects to the proposed development.

Transport/Travel (site specific).

The development site is situated east of Hoo at the far end of a main access road (Stoke Road) in and out of the village. There is currently no regular bus or route serving Stoke Road, meaning the only realistic mode of transport will be the private car. This is compounded by the fact the development site is over 15 minutes’ walk away from the centre of Hoo (where the majority of services are located). A significant Section 106 contribution is needed to introduce a regular bus service along Stoke Road - this should also serve the Kingsnorth Industrial Estate/Business Park nearby.

Stoke Road itself is in poor condition and the design is not attractive for pedestrians and cyclists. The road has been affected by the numerous recent developments along Stoke Road, which have resulted in a disorderly and chaotic design - particularly where the pedestrian footpath widens considerably in parts but then becomes very narrow. Stoke Road requires considerable traffic calming measures and reconfiguration to bring the entire stretch up to scratch. A Road Safety Audit has recently been requested in order to cost and recommend alterations to the road to improve pedestrian, cyclist and vehicle safety. A significant Section 106 contribution is needed to fund these measures.

Bird disturbance mitigation (SAMMS).

The development site falls within the proximity of important and protected local wildlife sites, requiring the applicant to make the relevant contributions. Based on 134 dwellings, this contribution should be at least **£43,988.18**.

Cultural Services (including community services, heritage & museums, and libraries).

Hoo & Chattenden Parish Council has a significant multi-million-pound project of replacing Hoo Village Hall off Pottery Road, Hoo with a new and up-to-date Community Centre. This is a priority project for the community and due to the increase in costs for materials and labour, there is a need for additional funding in the form of Section 106 Developer Contributions. The per dwelling figures for community services, heritage & museums, libraries should be combined and allocated for this project. Based on 134 dwellings, this contribution should be at least **£113,408.22**.

The applicant is proposing a small community hub/café on the development site itself. The cost of providing this should instead be allocated to the Community Centre project as a Section 106 Developer Contribution. This is to ensure there isn't (ultimately) several community hubs built around Hoo, as resources should instead be focused in one place on one existing project that meets the needs of local residents.

Education (including nursery, primary, secondary and sixth form).

Any Section 106 Developer Contributions for this category should only be spent at educational establishments in Hoo. Namely (1) St. Werburgh Primary School off Pottery Road, Hoo, (2) the Hundred of Hoo Primary Academy off Main Road, Hoo, (3) The Hundred of Hoo Academy off Main Road, Hoo and (4) any pre-school nurseries in Hoo. Primary school places in Hoo and Chattenden have been at capacity since 2015, therefore a significant Section 106 contribution needs to be made specifically to primary school provision. Based on 134 dwellings, this contribution should be at least **£1,460,243.56**.

Health.

Any Section 106 Developer Contributions for this category should only be spent at health establishments in Hoo. Namely (1) St. Werburgh Medical Practice off Bells Lane, Hoo, (2) The Elms Medical Practice off Main Road, Hoo and (3) The Walter Brice Centre off Main Road, Hoo. GP primary care in Hoo and Chattenden is at capacity with GP practices serving above national average numbers of patients on their registers. Therefore a significant Section 106 contribution needs to be made specifically for GP primary care. Based on 134 dwellings, this contribution should be at least **£113,279.58**.

Open/play space, outdoor formal sport.

Any Section 106 Developer Contributions for this category should only be spent on open/play spaces or outdoor formal sport in Hoo. Namely (1) Pottery Road Recreation Ground off Pottery Road, Hoo, (2) Kingshill Recreation Ground off Fourwents Road, Hoo, (3) Hoo Village Allotments off Everist Drive, Hoo, (4) Hoo Memorial Garden off Vicarage Lane, Hoo, (5) Hoo Village Square (centre of Hoo) off Church Street, Hoo, (6) Main Road Verges (outside the HOHA) off Main Road, Hoo and (7) Deangate Ridge Country Park off Dux Court Road, Hoo. Some of these spaces are managed by Hoo & Chattenden Parish Council and some are managed by Medway Council. Hoo Village Square (centre of Hoo) in particular needs a significant Section 106 contribution as it has not had any investment for over ten to fifteen years - despite being the key destination of the village. Based on 134 dwellings, this contribution should be at least **£457,068.64**.

The applicant is proposing the removal of existing outdoor formal sport and so this category should be given particular attention.

Sports facilities.

Any Section 106 Developer Contributions for this category should only be spend on sports facilities in Hoo. Namely (1) Deangate Ridge Country Park (including the running track and tennis courts) off Dux Court Road, Hoo and (2) Hoo Swimming Pool off Main Road, Hoo. The running track and tennis courts at Deangate Ridge in particular need a significant Section 106 contribution. Based on 134 dwellings, this contribution should be at least **£43,615.66**.

The applicant is proposing the removal of existing sports facilities and so this category should be given particular attention.

Waste and recycling.

The applicant will need to make a contribution to the local authority concerning refuse collection and recycling - mainly to pay for wheelie bins and other containers or for infrastructure at recycling centres. Based on 134 dwellings, this contribution should be at least **£30,999.56**.

Youth provision.

Any Section 106 Developer Contributions for this category should only be spent on youth provision in Hoo. Namely (1) Hoo Youth Club based at Hoo Village Hall off Pottery Road, Hoo. The Local Planning Authority (LPA) should be aware that the youth service in Hoo is moving to Hoo Village Hall from Hoo Library off Church Street, Hoo. This will allow the Medway Council provided youth service to offer a greater range of activities and services. Youth provision is a very important local issue and therefore a significant Section 106 contribution is required. Based on 134 dwellings, this contribution should be at least **£14,029.80**.

The applicant should be making Section 106 contributions amounting to at least **£2,276,630.52** in total.

Best wishes and kind regards,

Michael Pearce

Councillor Michael Pearce
Independent
Hoo & High Halstow Ward
Medway Council

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Dave Harris
Gun Wharf,
Dock Road,
Chatham,
Kent,
ME4 4TR

5 March 2025

Dear Mr Harris,

LAND AT THE FORMER STURDEE CLUB, STOKE ROAD, HOO
APPLICATION REF: MC/23/2857
ESQUIRE DEVELOPMENTS

I write ahead of the planning committee on Wednesday 12 March 2025 in which the above referenced planning application is to be heard. I write to set out the proposed benefits of the scheme and some additional detail with regards to the proposals.

The scheme will deliver the following benefits:

Homes

- Providing 134 much needed homes.
- 25% Affordable Homes (34No) orientated towards first time buyers.
- Mix of 1-5 bed high quality well designed homes.
- 10No. homes safeguarded for later living (over 55's).
- Use of high quality materials.
- Quick delivery of site within the 5 year period.

Employment

- Providing both permanent and temporary job opportunities through construction and the commercial uses.
- Delivery of Rural Office space in 3 blocks including the relocation of Esquire Developments to Medway and market interest in the remaining two blocks.
- Provision of Children's Nursery and FTE Opportunities.
- SME Local Supply chain employing local people and supporting local business.

Community Uses

- Delivery of a community hub/café following specific request of the Parish Council and will provide an identifiable focal point for the local community.
- End User has already been identified and business case approved by Esquire Developments.
- 120 place Children's Nursery to serve the development and the wider Hoo Peninsula. End User has already been identified and business case approved by Esquire Developments.

- To be delivered in the early phases of developments and ensure community infrastructure is delivered in advance of the homes.
- Public Access to new opens space and play areas.

Public Transport/Highways

- Provision of S106 Contributions to upgrade the local Bus Service serving the site and wider area.
- Delivery of new public footpaths linking east/west parcels and linking to the wider existing public right of way network accessing the countryside.
- Section 106 Contributions towards highway upgrades at key off site junctions including Four Elms and other localised junctions.
- Provision of Travel Plan to encourage improved knowledge of alternative transport options to a private vehicle including voucher provision to encourage public transport use and walking/cycling activities.

Climate Change

- Positively addressing climate change by bringing forward an all-electric development by way of a fabric first approach and Air Source Heat Pumps (i.e. no gas Boilers).
- Overall effect will be approximately 50% in carbon reduction over and above current Building Regulations
- Exploring opportunities for communal on site energy generation through Photovoltaics and communal battery storage to support the development and help with the cost of living crisis and offer reduced utility bills.

Heritage

- The reimagination of the Hoo Stop Line through landscaping proposals and storyboards
- The sterilisation of a large proportion of the site to maintain the heritage link between local Listed Pill Boxes and the Stop Line and thus enhancing heritage features.
- Improving social value and local recognition of the role the local area played in World War II.

Landscape and Biodiversity

- Substantial areas of landscaping across all sites to soften the development but also structured in a way to allow views of the River from Stoke Road and vistas of the local area.
- Improvements to Biodiversity Net Gain.
- Provision of SuDS
- Provision of Play areas and play equipment throughout the site in a trim trail

Section 106 Contributions

- Delivery of substantial S106 Contributions including Education, GPs, Open Spaces and strategic Public Transport and Highways Improvements.

As outlined above, the scheme proposes a substantial amount of benefits to the local community as well as not only mitigating its impacts but providing for contributions to the wider strategic infrastructure. We are fully committed to delivering this scheme and notably have committed to delivering the non-residential uses early in the phasing of the site. This was the same approach to our Woodlands development in Cliffe Woods and understand and recognise the value that bringing in the non-residential uses early on in the build has a positive effect on the development and community as a whole.

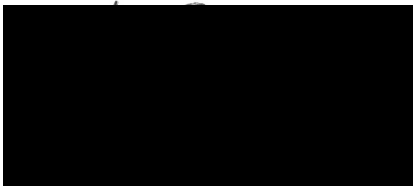
We have committed to relocating our Head Office to Medway and this site and as outlined, already have end users agreed for the café and nursery and market interest in the remaining office spaces, thus further ensuring the delivery of these uses.

The overall mix of the scheme including private, affordable and over 55's homes alongside the commercial and community uses provides for an all-round development offering a genuine mixed and balanced community and will set a benchmark for design and quality for Medway.

I hope the above helps and if you have any questions, please do not hesitate to contact me.

Yours sincerely

Andrew Wilford



**Head of Land and Planning
Esquire Developments**

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