

Planning Committee – Supplementary agenda No.1

A meeting of the Planning Committee will be held on:

Date: 8 April 2026

Time: 6.30pm

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

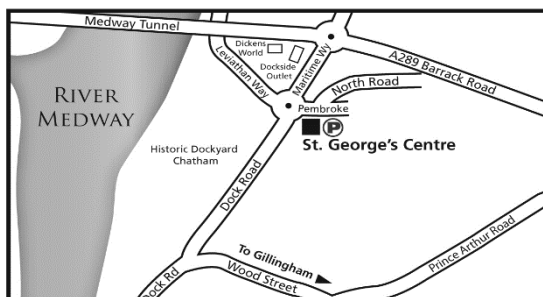
Items

- 8 Additional Information - Supplementary Agenda Advice Sheet (Pages 3 - 32)

For further information please contact Julie Francis-Beard, Democratic Services Officer on Telephone: 01634 332012 or Email:

democratic.services@medway.gov.uk

Date: 8 April 2026



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Medway Council
Planning Committee – 8 April 2026
Supplementary Agenda Advice Sheet

**Minute number 771 – Page 18 – Planning Application MC/25/1506
Shaftesbury House, Upnor, Rochester, ME2 4XB**

The agreed reason for refusal is set out below:

The use of the building for a 13 person House of Multiple Occupation in a location without access to day to day facilities by foot or regular public transport and without the provision of adequate parking for all residents or rooms the development would provide low cost accommodation in an area that would be unsuitable to meet the needs of the occupants and, therefore, not achieve sustainable development, in particular the social objective of delivering a range of homes provided to meet the needs of present and future generations with accessible services, contrary to paragraph 8 of the National Planning Policy Framework (2024).

**Page 24 – Planning Application MC/23/1934 Land at Ratcliffe Highway,
Hoo St Werburgh, Rochester**

Representations

Objection - The Independent Group

Since the Planning Committee report was completed, The Independent Group have submitted a Rebuttal to the Case Officer Report which includes suggested Reasons for Refusal. This rebuttal is set out in full and attached to this supplementary report.

Officer Comment: The Independent Group rebuttal does not raise any additional considerations beyond the matters contained within the original Officer Report.

**Page 92 – Planning Application MC/24/2022 Land west of Hoo St
Werburgh, Rochester**

Representations

Objection - The Independent Group

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Officer Comment: The Independent Group rebuttal does not raise any additional considerations beyond the matters contained within the original Officer Report.

**Page 182 – Planning Application MC/26/0094 54 Woodlands Road,
Gillingham, Medway ME7 2DS**

Representations

Three further letters of objection have been received from previous objectors following the re-consultation of amended plans raising the following concerns:

- The applicant no longer owns the property; a Certificate B should be served;
- Parking Provisions for Care Staff;
- Inaccurate information in Planning Statement;
- Inaccurate Address in Climate Change Statement;
- Nature of Development Care Home vs Supported Accommodation.

Officer Comment: The ownership certificate was correctly submitted as a validation requirement at the time the application was made. The other matters raised are covered in the main report.



Representation concerning MC/23/1934 (Appeal 6002996)

Written by Cllr. Michael Pearce (Group Planning Spokes).

"Outline planning application (all matters reserved except for access) for the erection of up to 240 residential dwellings, including 25% affordable housing, together with a new vehicular access point from Ratcliffe Highway, open space, landscaping and associated works."

Land At Ratcliffe Highway, Hoo

Case Officer Report Rebuttal and Reasons for Refusal

Wednesday 1st April 2026

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About The Independent Group (TIG)

The Independent Group (TIG) is a group of five Independent Councillors who sit on Medway Council. We represent the following Medway Council Wards and the following rural villages on the Hoo Peninsula in Kent:

Strood Rural Ward: Cliffe, Cliffe Woods, Cooling, Frindsbury, Wainscott and Upnor.

Hoo St Werburgh & High Halstow Ward: Chattenden, Hoo St Werburgh, High Halstow and Kingsnorth.

Cllr. Turpin (Group Whip) and Cllr. Williams (Group Member) represent Strood Rural Ward (achieving over 52.5% of the vote at the 2023 Local Election) and Cllr. Crozer (Group Leader), Cllr. Pearce (Deputy Group Leader) and Cllr. Sands (Group Member) represent Hoo St Werburgh & High Halstow Ward (achieving over 70% of the vote at the 2023 Local Election). TIG represents a clear and significant majority of the electorate on the Hoo Peninsula - a strong rural community with productive fertile agricultural land, valued landscapes, rich heritage, and internationally and nationally important habitats, supporting bio-diverse wildlife. The Hoo Peninsula is part of the proposed East Coast Wetlands designation to become a UNESCO Natural World Heritage Site.

The existing development plan for the Hoo Peninsula includes two recently adopted Neighbourhood Plans: (1) Hoo St Werburgh & Chattenden Neighbourhood Plan and (2) Cliffe & Cliffe Woods Neighbourhood Plan.

TIG also supports the residents and Parish Councils of **All Saints Ward:** Allhallows, St. Mary Hoo, Stoke and Grain.

Chapter 1: Executive Summary

1. We object to the officer recommendation that, had a non-determination appeal not already been made, the Council would have approved this application. In our submission, the report is not a safe basis for a committee resolution to support the scheme at inquiry. It gives too much practical weight to the submitted emerging Medway Council Local Plan, too little weight to the made Hoo St Werburgh and Chattenden Neighbourhood Plan, and treats a number of unresolved transport, public transport, active-travel and ecological matters as though they can simply be deferred to conditions.

2. The report's principal weakness is its heavy reliance on the submitted emerging Local Plan allocation of this site. That approach is now materially undermined by the examining Inspectors' Initial Queries Letter of 27 March 2026, which states that the examination is still at an early stage, that adoption is unlikely during 2026, that the Inspectors have identified areas of particular concern and significant concerns, and that further evidence and potentially further consultation may be required before any hearings take place. In those circumstances, the emerging allocation cannot safely bear the weight the report places upon it.

3. The report is also vulnerable because it acknowledges unresolved active-travel and public-transport issues, including the fact that Active Travel England remained not in a position to support the application and that the Council is not currently in a position to secure a bus service improvement. Yet despite those admissions, the report concludes that the site is in an accessible location where safe and suitable access can be achieved for all. That conclusion is stronger than the underlying evidence supports.

4. The ecology section presents similar difficulties. The report records concerns from Kent Wildlife Trust and KCC Ecology, including the need for additional bird survey information and mitigation in relation to skylark and nightingale, yet still recommends approval subject to future surveys and later-stage conditions. In our submission, those are not merely implementation details; they go to whether the ecological case is sufficiently complete to justify permission at all.

5. The report also does not convincingly resolve the direct conflict with the Neighbourhood Plan on landscape and settlement separation. The Hoo St Werburgh and Chattenden Neighbourhood Plan identifies the open separation between Hoo and Chattenden as being of significant local value and says it should be retained. The report summarises this objection but does not adequately explain why it is overridden.

6. For those reasons, the committee should not endorse the recommendation. It should instead resolve that, had the application still been before it, planning permission would have been refused.

Chapter 2: Purpose of this Representation

7. This representation is made to assist members in scrutinising the officer report before the committee meeting of 8 April 2026.

8. We recognise that the purpose of the committee resolution is not to issue a planning permission, because the application is now at appeal for non-determination. The purpose is to determine what the Council's position would have been had it retained jurisdiction and, therefore, what position the Council will take at the inquiry. The committee is therefore not asked merely to note the report; it is asked to decide whether the reasoning in the report is sufficiently persuasive to justify the Council supporting the proposal at inquiry.

9. In our submission, it is not. The report contains a number of important internal tensions and unresolved dependencies which make a recommendation of support unsafe.

Chapter 3: The Report Gives Excessive Weight to the Emerging Local Plan

10. The report expressly acknowledges that the proposal conflicts with the spatial strategy of the adopted Local Plan, including Policies BNE25 and H11, and that the development conflicts with the adopted development plan when read as a whole. Yet it concludes that greater weight should be given to the emerging Local Plan and that the proposal is therefore acceptable in principle and should be approved subject to conditions and obligations.

11. That is a major weakness. A submitted but unexamined Local Plan allocation is not equivalent to an adopted development plan allocation. The emerging plan is a material consideration, but its weight depends on stage, objection and soundness. The report's practical reasoning goes beyond that and uses the draft allocation as one of the central reasons for supporting the scheme.

12. The report's reliance on the emerging plan is now weaker still because of events after the report's internal policy analysis was prepared. On 27 March 2026, the examining Inspectors wrote to Medway Council stating that, following their initial review of the submitted Plan and evidence, they had identified "some areas of particular concern" and matters on which they required clarification at this early stage of the examination.

13. The Inspectors also stated that, because the examination is at an early stage, adoption is unlikely to occur during 2026 and asked the Council to explain how the Plan would satisfy the NPPF requirement that strategic policies look ahead for a minimum period of 15 years from adoption. That is directly relevant to the report’s assumption that the submitted plan is a sufficiently settled strategic framework to justify present approval.

14. Most importantly, in paragraphs 30 to 31 of their letter, the Inspectors stated that the Council would likely need to undertake further work, that they had raised “some significant concerns,” that they were not yet in a position to set out a definitive process or timetable for the next steps of the examination, and that they anticipated further new evidence and other documents might need to be submitted, such that a further consultation may be necessary before any hearings take place.

15. In those circumstances, it is not sound for the officer report to place such substantial practical weight on the draft allocation of this site in the emerging plan. Members should be slow to support a scheme today on the basis of an allocation that is plainly still under significant scrutiny and which may yet be modified, delayed or found unsound in part.

16. This concern is reinforced by the Richard Buxton Solicitors letter of 19 March 2026, which raises objections to the lack of consultation on substantial new post-Regulation 19 evidence, including HRA, strategic transport, flood risk and infrastructure material, and identifies allocation HHH11 among a number of Hoo Peninsula allocations close to sensitive ecological sites. Whether members agree with every submission in that letter or not, it demonstrates that the emerging plan is not a settled and uncontroversial framework.

Chapter 4: The Report Underweights the Made Neighbourhood Plan

17. The Hoo St Werburgh and Chattenden Neighbourhood Plan is already made and forms part of the statutory development plan. That is not a peripheral consideration. It is the current plan-led framework for this locality.

18. Yet the report, in substance, subordinates it to the submitted emerging Local Plan. It acknowledges conflict with the Neighbourhood Plan on the principle of growth and summarises objections based on HOO8, HOO11 and HOO12, but then approves anyway by placing overriding reliance on the emerging allocation and the tilted balance.

19. This is especially problematic because the Neighbourhood Plan is directly concerned with the very issues that remain contested here: transport and active travel, landscape and settlement separation, and ecology. It is therefore not enough to note conflict and move on. Members need to ask whether the report has truly engaged with the force of that conflict.

20. The treatment of Policy HOO11 is a good example. The report says that HOO11 “relates better to detailed plans and reserved matters applications” because it refers to matters such as secure cycle storage, EV charging, parking and quality pedestrian links. That, with respect, is too narrow. HOO11 is also about the broader requirement to prioritise safe active travel and sustainable movement over private car use and to link conveniently and safely to public transport. Whether that can be achieved on this site goes directly to present acceptability, not merely later design detail.

21. By reducing HOO11 largely to a reserved matters issue, the report weakens the force of one of the most relevant current development plan policies. Members should, in our submission, reject that approach.

22. The same is true of HOO8. The report summarises submissions that the proposal conflicts with HOO8 because it would erode the open landscape separation between Hoo and Chattenden and because that separation is identified in the policy as being of significant local value and required to be retained. The report does not squarely explain why that policy conflict is overcome. It simply moves to a broad planning balance in which the emerging allocation and housing need do most of the work.

Chapter 5: The Public Transport Case Is Speculative

23. The officer report does not present a robust or secure public transport case.

24. Active Travel England initially recommended refusal because it considered the site to be in an unsustainable location and said that the adjacent site would need to come forward to ensure sustainable connections through to Main Road and Hoo Village. As of 24 June 2025, ATE remained “not currently in a position to support” the application and requested further assessment, evidence, revisions and dialogue.

25. ATE also stated that, while it understood Arriva to be supportive of the potential diversion of the 191 bus service through the site, it would welcome further information on how bus improvements would be secured and whether the local highway authority considered them deliverable and feasible. That is a very important caveat. It means the specialist consultee was not treating the bus improvements as resolved, secure or proven.

26. The report then compounds the problem by stating that Medway Council is “not in a position to secure a bus service improvement currently.” That is a stark admission. A scheme of 240 dwellings should not be supported as sustainably located where the authority itself cannot presently secure the key bus improvement on which the sustainability case appears to rely.

27. The report nevertheless continues by saying that the current Arriva 191 route offers a reasonably good service to the village and by looking ahead to future wider transport improvements through the Sustainable Transport Strategy and growth on the Hoo Peninsula. That is not the same thing as a secured site-specific public transport offer. It is aspiration.

28. Members should therefore be wary of any suggestion that the bus issue is resolved. It is not resolved on the report’s own terms.

Chapter 6: The Site Depends on Third-Party and Future Infrastructure

29. A further weakness is that the report repeatedly relies on infrastructure and movement arrangements that are not secured within this application alone.

30. The report expressly states that the proposed spine road “only works in conjunction with the adjacent Taylor Wimpey site” and that collaboration with that site will be required to continue the proposed cycleway and footway to the same or similar specification. It justifies this by saying the adjacent site is making headway and remains allocated in the emerging Local Plan.

31. That is a vulnerable line of reasoning. The current site should be capable of being judged on its own merits now. If its better active-travel and public-transport performance depends materially on the future

delivery of another site, another application, another road connection and another set of details, that suggests the current site is not yet demonstrating a complete and robust transport solution.

32. The same issue arises with the proposed bus gate. The report notes that the Taylor Wimpey transport assessment proposes a spine road that would not be a through route for all traffic and would instead rely on a bus gate or camera enforcement so that only buses, pedestrians and cycles could pass between the two sites. Medway Council supports the use of bus gates and asks the applicant to provide a joint statement on the topic, identifying the location and clearly demonstrating its inclusion in the site design. The report says this can come forward by condition before commencement.

33. That is another example of a major operational feature of the sustainable-transport strategy not being settled at decision stage. Members should ask whether a bus gate is genuinely a later detail, or whether it is a key part of the scheme's claimed sustainability which ought to be resolved before support is given.

34. The eastern pedestrian connection is also problematic. The report accepts that the strategic design of the site appears to rely on the narrow alleyway between 69 and 71 Vidgeon Avenue, but acknowledges that this alleyway offers no realistic opportunity to meet the needs of all users such as cyclists, wheelchair users, mobility scooter users or people with pushchairs.

35. That is a serious weakness. A route that is acknowledged to be inadequate for inclusive use cannot reasonably be treated as a sound answer to HOO11 and HOO12 or to the broader question whether safe and suitable access can be achieved for all.

36. The report then speculates that there is no reason a bus-only route could not proceed along the line of the eastern connection and refers to land north of Vidgeon Avenue shown on the applicant's masterplan as a potential site for development by others. Again, that is a future possibility, not a secure current solution.

Chapter 7: Active Travel England's Position Is Not a Minor Issue

37. The report's treatment of Active Travel England should concern members.

38. This is not a case where ATE offered broad support subject only to fine-tuning. It is a case where ATE was not in a position to support the application, sought further information and revisions, wanted more confidence on bus deliverability, and recommended an agreed traffic calming scheme to secure lower speeds and acceptable crossing conditions on Ratcliffe Highway.

39. ATE's position matters because the committee is being asked to support a scheme partly on the basis that it is in an accessible location and that active travel and public transport can be prioritised and improved. If the specialist statutory consultee on those matters remains unconvinced, that is plainly a significant weight-bearing factor against approval.

40. The report should therefore have been slower to conclude that the site is acceptable in active-travel terms. Instead, it appears to move relatively quickly from unresolved consultee concerns to a position that later conditions can fill the gap.

Chapter 8: Ecology Is Not Resolved

- 41.** The ecology section is another area where the recommendation is more confident than the underlying evidence.
- 42.** Kent Wildlife Trust states that the development will result in the total loss of suitable foraging habitat for skylark and other ground-nesting birds and that no on-site or off-site mitigation has been put forward. It recommends that measures be secured to address the loss of habitat, including a mitigation strategy for compensatory skylark habitat and winter food provision. It also recommends that further information on how impacts to nightingales will be mitigated should be provided prior to determination.
- 43.** Those are not minor points. They go to whether the proposal's effect on important bird species is sufficiently understood and whether adequate mitigation exists now.
- 44.** KCC Ecology, as summarised in the report, has recommended that additional information is required, mainly relating to bird surveys. The report also notes that, despite the Natural England SSSI Impact Risk Zone indicating that the size and location of the proposals pose a risk to nearby designated sites, Natural England has not provided a consultation response that takes into consideration the submitted information.
- 45.** Members should ask themselves whether this is really the right moment to support the scheme. If additional ecological information is still required, if bird impacts remain live, and if there is no up-to-date Natural England response on the submitted information in a sensitive location, the safer course is not approval.
- 46.** This concern is reinforced by condition 15, which would require industry-standard breeding bird surveys before the first reserved matters application. The reason given for that condition is explicit: there is a lack of optimal habitat within the application site, but given the proximity of a large nightingale population and the fact that the adjacent site had positive skylark registrations during the breeding season, the authority wishes to confirm absence and ensure mitigation can be implemented if those species are found.
- 47.** In other words, the report is recommending approval while accepting that the baseline bird evidence is not yet good enough to provide confidence on key species. That is not a secure decision-making position.
- 48.** The report also notes that carrying out just one breeding bird survey early in the season is not adequately justified and that the adjacent site recorded nine skylark registrations during the breeding season. That underscores the point that the ecological case is not settled.
- 49.** Conditions can regulate implementation of ecological mitigation. They should not be used to discover, after permission is granted, whether a material ecological problem exists and what must then be done about it.

Chapter 9: Habitat-Site Conclusions Are Too Confident

- 50.** The report ultimately states that, with the implementation of the proposed mitigation measures, the development would not give rise to any unacceptable impacts on habitat sites or SSSIs.
- 51.** That final conclusion is difficult to reconcile with the report's own narrative:
- additional ecological information is still required,
 - Natural England has not provided a response taking account of the submitted information,
 - the Hoo Peninsula strategic environmental programme in the emerging Local Plan is still under examination scrutiny,

- and bird mitigation is still not fully developed.

52. Members should be cautious before endorsing that level of certainty.

Chapter 10: Landscape and Settlement Separation Are Not Properly Answered

53. The report also fails, in our submission, to provide a convincing answer to the landscape and settlement separation case.

54. It summarises the objection that Policy HOO8 states the open character of the landscape separating Hoo St Werburgh and Chattenden is of significant local value and must be retained, and that development eroding this separation conflicts with HOO8. It also summarises the point that the Inspector in the Taylor Wimpey appeal found that developing the valley would compromise the perceived separation between Hoo St Werburgh and Chattenden, harming character and appearance, and that the same reasoning applies with equal or greater force here.

55. Yet the recommendation does not squarely explain why this direct current development plan conflict is overridden. It leans instead on the emerging allocation and the general planning balance.

56. That is inadequate. Members are entitled to ask for a clear explanation of why a policy saying that this separation is of significant local value and should be retained is not offended by the current proposal. In our submission, the report does not provide that explanation.

57. The presence of a councillor comment raising the absence of a land and visual impact assessment adds to the concern. Even if members ultimately take a different view from that comment, it highlights the degree to which landscape assessment remains an issue rather than a closed matter.

Chapter 11: The Report Relies Too Heavily on Later Conditions

58. One of the clearest themes running through the report is that many key matters are left to conditions:

- phasing,
- bird surveys,
- ecological design strategy,
- external lighting,
- traffic calming,
- bus stop locations,
- swept paths,
- trip distribution and mitigation,
- and detailed walking/cycling route design.

- 59.** Conditions are appropriate for true details. They are not an answer where the unresolved issue goes to the basic principle of whether the site is suitable and whether impacts are properly understood.
- 60.** In transport terms, members are being asked to support the scheme before bus improvement is secured, before the bus gate is fixed, before Bell’s Lane impacts are fully assessed, and before the connection to the adjacent site is designed and locked in.
- 61.** In ecological terms, members are being asked to support the scheme before the baseline bird surveys are sufficiently robust and before species mitigation is clearly worked through.
- 62.** In landscape terms, members are being asked to support the scheme despite a direct policy concern about retaining separation and without a fully persuasive answer to that conflict.
- 63.** Taken together, this is too much deferral. The committee should not endorse a recommendation that depends so heavily on “approve now, sort later.”
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Chapter 12: The Planning Balance Is Not Persuasive

- 64.** The report’s final planning balance gives moderate positive weight to economic benefits, very substantial positive weight to market and affordable housing, and then concludes that the adverse impacts do not significantly and demonstrably outweigh the benefits.
- 65.** But the balance is only as good as the premises on which it rests.
- 66.** If the emerging Local Plan is carrying too much weight, if the Neighbourhood Plan is carrying too little, if public transport is still speculative, if active-travel performance depends on third-party land, if ecology remains unresolved, and if settlement separation conflict is not properly addressed, then the balance is unsound.
- 67.** The report itself accepts that the development conflicts with the adopted development plan when read as a whole. That should have been a starting warning sign, not a hurdle that could be cleared simply by reference to an emerging allocation and general housing need.
- 68.** In our submission, the correct planning balance points the other way. The current statutory development plan should carry real force; the submitted emerging plan should carry only limited weight at this stage; and the unresolved transport, active-travel, ecological and settlement-separation issues should weigh materially against support.
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Chapter 13: Conclusion

- 69.** For all of the reasons set out above, we respectfully urge members not to follow the officer recommendation.
- 70.** The report is not a secure or convincing basis for a committee resolution to support the appeal. It relies too heavily on a submitted but unsettled emerging Local Plan, underweights the made Neighbourhood Plan, accepts an unsecure and speculative public transport strategy, depends on third-party and future

infrastructure, and acknowledges important ecological uncertainties while seeking to push them into conditions.

71. In those circumstances, the prudent and planning-led course is for the committee to resolve that, had the application remained before it, planning permission would have been refused.

Chapter 14: Suggested Reasons for Refusal

72. The following draft reasons for refusal are suggested for members' consideration.

73. Reason 1 – Principle of development / conflict with the development plan

The proposed development, by reason of its location outside the existing settlement boundary and within the countryside, would conflict with the spatial strategy of the adopted Medway Council Local Plan 2003, including Policies **BNE25** and **H11**, and with the Hoo St Werburgh and Chattenden Neighbourhood Plan insofar as the proposal has not demonstrated compliance with the current statutory development plan when read as a whole. The committee gives only limited weight to the submitted emerging Medway Council Local Plan because it remains at an early stage of examination, has not been found sound, has not been adopted, and is subject to significant concerns raised by the examining Inspectors. The proposal would therefore represent an unjustified departure from the current development plan.

74. Reason 2 – Transport, public transport and active travel

The proposal has failed to demonstrate that the site is, or can be made, genuinely sustainable in transport terms. In particular, the public transport case depends on unsecure and speculative future bus improvements; the authority is not currently in a position to secure the bus service improvement relied upon; and the scheme's active-travel and public-transport performance depends materially upon future third-party delivery on adjoining land. The proposal also fails to demonstrate convenient, inclusive and effective pedestrian and cycle connectivity for all users. The development would therefore conflict with Policies **T1, T3, T4, T5 and T6** of the Medway Council Local Plan 2003 and Policies **HOO11** and **HOO12** of the Hoo St Werburgh and Chattenden Neighbourhood Plan.

75. Reason 3 – Ecology and wildlife impacts

The proposal has failed to provide a sufficiently robust and complete ecological evidence base at the point of determination, particularly in relation to breeding birds including skylark and nightingale, and has not demonstrated that there would be no unacceptable harm to biodiversity, ecological connectivity and nearby designated ecological receptors. The committee is not satisfied that these matters can properly be deferred to later surveys and later-stage mitigation by condition. The proposal therefore conflicts with Policies **BNE35, BNE37, BNE38 and BNE39** of the Medway Council Local Plan 2003 and Policy **HOO8** of the Hoo St Werburgh and Chattenden Neighbourhood Plan.

76. Reason 4 – Landscape and settlement separation

By reason of its siting, scale and encroachment into open land west of Hoo St Werburgh, the proposal would erode the open landscape separation between **Hoo St Werburgh** and **Chattenden**, harm the role of the **Chattenden Valley** corridor, and undermine a characteristic that the Hoo St Werburgh and Chattenden Neighbourhood Plan identifies as being of significant local value and which should be retained. The proposal would therefore harm the character and appearance of the area and contribute to coalescence and urban sprawl, contrary to Policies **BNE1** and **BNE25** of the Medway Council Local Plan 2003 and Policy **HOO8** of the Hoo St Werburgh and Chattenden Neighbourhood Plan.

77. For those reasons, we respectfully request that the Planning Committee reject the officer recommendation and resolve that, had the application remained before it, planning permission would have been refused.

Thank you for taking the time to read this representation.



George Crozer

Cllr. George Crozer (Ind)

Group Leader

Hoo & High Halstow Ward

Michael Pearce

Cllr. Michael Pearce (Ind)

Deputy Group Leader

Hoo & High Halstow Ward

Ron Sands

Cllr. Ron Sands (Ind)

Group Member

Hoo & High Halstow Ward

Written by Cllr. Michael Pearce (Group Planning Spokes).

Please note: this representation has not been signed by Cllr. Elizabeth Turpin and Cllr. John Williams - one of these Councillors will substitute for Cllr. Michael Pearce, who is a member of the Planning Committee, when the application is decided. Cllr. George Crozer, Cllr. Michael Pearce and Cllr. Ron Sands are Ward Councillors for where the application is located.

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Representation concerning MC/24/2022 (Appeal 6004418)

Written by Cllr. Michael Pearce (Group Planning Spokes).

"Outline planning application (with all matters reserved except access) for the construction of up to 450 dwellings, commercial floorspace (up to 500sqm), community use building (up to 500sqm), associated public open space, landscaping, outdoor sports facilities, drainage and earthworks."

Land West of Hoo St Werburgh

Case Officer Report Rebuttal and Reasons for Refusal

Wednesday 1st April 2026

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About The Independent Group (TIG)

The Independent Group (TIG) is a group of five Independent Councillors who sit on Medway Council. We represent the following Medway Council Wards and the following rural villages on the Hoo Peninsula in Kent:

Strood Rural Ward: Cliffe, Cliffe Woods, Cooling, Frindsbury, Wainscott and Upnor.

Hoo St Werburgh & High Halstow Ward: Chattenden, Hoo St Werburgh, High Halstow and Kingsnorth.

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The existing development plan for the Hoo Peninsula includes two recently adopted Neighbourhood Plans: (1) Hoo St Werburgh & Chattenden Neighbourhood Plan and (2) Cliffe & Cliffe Woods Neighbourhood Plan.

TIG also supports the residents and Parish Councils of **All Saints Ward:** Allhallows, St. Mary Hoo, Stoke and Grain.

Chapter 1: Executive Summary

1. We write in response to the Case Officer Report for MC/24/2022. We support the recommendation that planning permission should be **refused**, but we respectfully submit that the report is too narrow, too concessive to the applicant on several major issues, and too weakly reasoned to provide the strongest possible basis for the Council's position at Planning Committee and, if necessary, at appeal.

2. The report is right to conclude that the proposal would fail to provide a sufficient and effective landscape buffer functioning as part of a strategic landscape corridor, that it would erode the separation between Hoo and Chattenden, and that it would conflict with the Neighbourhood Plan's protection of that separation. Those conclusions are sound and should be upheld.

3. However, the report is materially weakened by its repeated acceptance that:

- (a) "the principle of residential-led development on the site is supported";
- (b) the site is in an accessible location where safe and suitable access can be achieved for all;
- (c) there would be no unacceptable habitat-site or SSSI harm with mitigation;
- (d) there would be no unacceptable flood risk harm; and

(e) transport works attract moderate positive weight.

Those are major concessions in a case where the site's strongest vulnerabilities remain sustainability of location, car dependence, the weakness of the active-travel and bus case, and conflict with the made Neighbourhood Plan.

4. The report also places excessive practical weight on the submitted emerging Medway Council Local Plan and draft allocation HHH8/SA8. That approach is now significantly undermined by the Local Plan Inspectors' Initial Queries Letter of 27 March 2026, which says the examination is still at an early stage, identifies areas of "particular concern" and later "significant concerns," indicates that the Plan is unlikely to be adopted during 2026, and states that further work and possibly further consultation may be necessary before hearings take place.

5. The report further underuses the significance of the previous refusal and dismissed appeal on substantially the same land. The earlier appeal was not dismissed only because of landscape harm. It was also dismissed because the site was not made adequately sustainable, had poor pedestrian connectivity, lacked bus penetration, and would result in significant car dependence. Those findings remain highly material and should have been given far more prominence in the current assessment.

6. Similar weaknesses have already been identified in the rebuttal to the adjacent MC/23/1934 case officer recommendation, including excessive reliance on the emerging Local Plan, underweighting of the made Neighbourhood Plan, speculative public transport assumptions, dependence on third-party and future infrastructure, unresolved active-travel issues, ecological uncertainty, overreliance on later conditions, and an unpersuasive planning balance. Those same categories of weakness are equally relevant here.

7. For those reasons, we respectfully ask Planning Committee not merely to endorse refusal on the single officer reason, but to strengthen the Council's position by resolving that, had the application remained before it, permission would have been refused on a broader and more robust basis, including unsustainable location, weak and unresolved active-travel/public transport provision, ecological uncertainty, and failure to secure the necessary section 106 mitigation.

Chapter 2: Purpose of this Representation

8. This representation is made to assist Members in scrutinising the Case Officer Report before Committee determination.

9. We recognise that, because the application is already at appeal for non-determination, the Committee is not issuing a planning permission or refusal notice in the ordinary way. The purpose of the Committee resolution is to determine what the Council's decision **would have been**, and therefore what position the Council should take at appeal. The question for Members is therefore not simply whether the report is professionally prepared, but whether its reasoning is sufficiently robust to justify the Council defending only the narrow refusal case currently recommended.

10. In our respectful submission, it is not. The report contains important internal tensions and makes concessions that are not justified by the evidence it summarises. It should therefore be treated as a starting point, not an endpoint.

Chapter 3: The Report Is Internally Inconsistent on the Principle of Development

11. One of the report's clearest weaknesses is its treatment of the principle of development.
12. The report correctly states that the site lies outside the built confines of Hoo St Werburgh, in open countryside, and that the proposal conflicts in principle with Policies **S1**, **S2**, **BNE25** and **H11** of the adopted Medway Council Local Plan, as well as with the spatial policies of the Neighbourhood Plan. It says explicitly that the proposal is in conflict with Policy BNE25 "as a matter of principle" and contrary to H11 because it is a major housing development outside the confines of the existing settlement.
13. Yet the report then states in the refusal reason itself that "the principle of residential-led development on the site is supported." That is a major and unnecessary concession. It creates an internal contradiction between the report's own description of development plan conflict and its headline conclusion.
14. The fact that paragraph 11(d) of the NPPF is engaged because of housing land supply does **not** mean the principle is supported. It means the development plan conflict must be weighed in the tilted balance. Those are different propositions. The report blurs them.
15. Members should therefore resist any suggestion that this is a site where the principle is effectively settled and only detailed mitigation remains. The report itself shows that is not the correct legal or policy position.

Chapter 4: The Report Gives Excessive Weight to the Emerging Local Plan

16. The report places substantial practical reliance on the submitted emerging Medway Council Local Plan and in particular on draft allocation **HHH8 / SA8**. It says the proposal is consistent with the spatial strategy of the emerging plan, that the site forms part of the planned extension of Hoo, and that the Council inevitably accepts a degree of landscape change by allocating greenfield land to meet strategic housing need.
17. That approach is now materially weakened by the Inspectors' Initial Queries Letter of 27 March 2026. The Inspectors say that, following their initial review of the Plan and evidence, they have identified "some areas of particular concern" and require further clarification at this early stage of the examination.
18. They also say that, because the examination is currently at an early stage, adoption is **unlikely during 2026**, and they ask the Council to explain how the Plan can comply with NPPF paragraph 22, which requires strategic policies to look ahead for at least 15 years from adoption.
19. Most importantly, at paragraphs 30 and 31 of the Inspectors' letter, they say the Council is likely to need to undertake further work; that they have raised "some significant concerns"; that they are not yet in a position to set a definitive timetable for the next steps of the examination; and that further new evidence is likely, such that **a further consultation may be necessary** before any hearings take place.
20. Those statements are fundamentally inconsistent with the report's practical treatment of the emerging Local Plan as a reliable, weight-bearing framework for approving development in principle. The submitted plan is clearly not yet settled.

21. This point is reinforced by the Richard Buxton Solicitors letter of 19 March 2026, which complains that major post-Regulation 19 evidence documents — including HRA, IDP, SFRA, STA and Hoo Peninsula Strategic Environmental Programme material — were published only at submission stage and had not been consulted on beforehand. Whether or not one accepts every aspect of that objection, it plainly shows that the evidential platform for the emerging plan remains contested.

22. In those circumstances, the Committee should not treat the emerging Local Plan as carrying anything more than **limited weight**, and certainly should not allow it to displace the current statutory development plan or to dilute the force of the made Neighbourhood Plan.

Chapter 5: The Report Underweights the Made Neighbourhood Plan

23. The Hoo St Werburgh and Chattenden Neighbourhood Plan is made and forms part of the statutory development plan. That is of major importance. It is not merely a local aspiration document. The starting point in law is that planning decisions must be taken in accordance with the development plan unless material considerations indicate otherwise.

24. The report acknowledges the Neighbourhood Plan, but in practice it underweights it by relying so heavily on the emerging Local Plan and the tilted balance.

25. This is particularly problematic because the Neighbourhood Plan directly addresses the precise matters that are most controversial in this application: the Hoo–Chattenden separation, Chattenden Valley, landscape character, ecology, sustainable transport, active travel, and path quality.

26. The adjacent MC/23/1934 rebuttal is helpful on this point. It rightly says that a made Neighbourhood Plan should not be subordinated to an unsettled emerging Local Plan, especially where the Neighbourhood Plan is the current statutory plan and directly addresses the very issues in dispute.

27. Members should therefore give substantial weight to Policies **H008**, **H0011** and **H0012** rather than treating them as secondary to draft SA8.

Chapter 6: The Previous Dismissed Appeal Should Carry Far Greater Weight

28. The report summarises the 2014 application and the 2016 appeal decision. It quotes the earlier Inspector’s findings on loss of separation between Hoo and Chattenden and the difference between severance and true separation. That is useful.

29. But the report does not sufficiently carry through the other decisive findings from that appeal. The 2016 Inspector found that the site would not be made adequately sustainable because of the almost complete absence of on-site employment, the paucity of nearby employment, the extent of the site, the absence of bus penetration, poor pedestrian connectivity with adjoining parts of Hoo, and the resulting significant car dependence. He dismissed the appeal despite substantial housing benefits and despite a worse housing land supply position than exists today.

30. Those findings are not historical curiosities. They remain highly material because they concern the same land, promoted by the same development interest, and they go to the enduring structural weaknesses of west-of-Hoo expansion.

31. The report should therefore have used the previous appeal not only as landscape evidence, but as a powerful comparator on sustainability and transport. Its failure to do so materially weakens its reasoning.

Chapter 7: The Public Transport Case Remains Speculative

32. The report does not present a secure public transport case.

33. It records that **Active Travel England** was not currently in a position to support the application and wanted more information, more revisions, and greater confidence on the deliverability of bus improvements.

34. It also records objections that the proposal risks diverting bus services away from the centre of Hoo, that the scheme relies heavily on bus assumptions, and that the public transport case is overly optimistic.

35. The adjacent MC/23/1934 rebuttal frames this correctly: the public transport case is speculative where the authority is not in a position to secure the bus improvement relied upon and where the scheme's sustainability depends materially on unsecure future service changes.

36. The current report nevertheless gives positive transport weight to the scheme. In our respectful submission, that is too generous. A site should not be treated as sustainably located on the basis of bus improvements that remain unproven, unsecured or dependent on later arrangements.

Chapter 8: The Site Depends on Third-Party and Future Infrastructure

37. Another serious weakness is the report's reliance on infrastructure and movement arrangements not fully secured within this application.

38. The adjacent rebuttal for MC/23/1934 is directly relevant here. It correctly criticises the use of third-party and future infrastructure as part of the present sustainability case, including dependence on adjoining land, future links and unresolved design features such as bus gates.

39. The same problem exists here. The Taylor Wimpey site's active-travel and bus strategy has repeatedly been described as part of a broader strategic pattern of growth. But that is not the same as a secure, self-contained and deliverable access strategy now.

40. If the proposal's public transport and active-travel performance depends materially on adjoining sites, later agreements, bus gates, later route connections and unresolved operational decisions, that is a strong indicator that the site's claimed sustainability is not yet properly demonstrated.

Chapter 9: Active Travel England's Position Is Not a Minor Issue

41. The report's treatment of Active Travel England is too dismissive.

42. This is not a case where ATE offered broad support subject to modest refinement. The report itself says ATE was not currently in a position to support the application and sought further evidence and revisions.

43. That matters because the Committee is being asked to accept that the site is in an accessible location and that safe and suitable access can be achieved for all. If the specialist consultee on active travel remains unconvinced, that ought to carry significant weight against the report's optimistic conclusions.

44. The adjacent MC/23/1934 rebuttal is again instructive. It treats ATE's unresolved position not as a minor detail, but as a major concern that weakens the credibility of the sustainability case. That same reasoning applies here.

Chapter 10: The Report Overstates the Accessibility and Highway Position

45. The report says the site is in an accessible location where safe and suitable access can be achieved for all, with highway impacts appropriately mitigated. That is one of the most generous and potentially problematic conclusions in the whole document.

46. That conclusion sits uneasily with the report's own summary of objections:

- poor public transport links,
- poor road conditions,
- congestion and parking difficulties,
- poor road safety for pedestrians near Chattenden School,
- disputes about the spine road / bus-only route,
- diversion of buses away from the centre of Hoo,
- and the wider cumulative pressure on Hoo.

47. It also sits uneasily with the previous appeal findings and the Neighbourhood Plan's evidence of poor connectivity and A228 pressure. The better view is that the site remains transport-constrained and car-dependent, even if some mitigation could reduce certain impacts.

48. The Committee should therefore avoid endorsing the proposition that the accessibility issue is essentially solved.

Chapter 11: Ecology Is Not Resolved

49. The ecology section of the report is too confident.

50. The report records concerns from the RSPB and Kent Wildlife Trust about nightingale sensitivity, recreational pressure, domestic pets, dog disturbance, habitat protection and the effectiveness of mitigation. It records that KCC Biodiversity requires updated species surveys and recommends conditions.

51. The adjacent MC/23/1934 rebuttal is persuasive on the same point: where key ecological issues still depend on further bird survey information and later-stage mitigation, that is not merely implementation detail; it goes to whether the ecological case is sufficiently complete to justify permission at all.

52. The report nevertheless concludes that, with mitigation, there would be no unacceptable habitat-site or SSSI harm. That is stronger than the underlying narrative justifies.

53. Where a sensitive ecological setting exists and further species work is still required, the Committee should be slow to endorse such confidence.

Chapter 12: Habitat-Site Conclusions Are Too Confident

54. The report's final habitat-site conclusion is especially vulnerable because it comes after a long summary of unresolved or qualified ecological concerns.

55. The adjacent MC/23/1934 rebuttal rightly warns against habitat-site conclusions that are too confident where evidence, mitigation delivery and species effects remain live issues. That criticism is equally apt here.

56. At the very least, the ecological side of the planning balance should have been treated more cautiously and with less confident positive framing.

Chapter 13: Drainage, Utilities and Infrastructure Are Underplayed

57. The report records that Southern Water's desktop study indicates that additional foul sewerage flows may increase the risk of foul flooding from the existing sewer network. It also records that the Lower Medway Drainage Board considers further clarification necessary because the FRA predates the 2025 National SuDS Standards and because runoff volumes, modelling assumptions, FEH22 rainfall, interception and reuse, and other matters still need to be addressed at detailed stage.

58. These are not trivial details. They go to whether the site's infrastructure and drainage impacts are genuinely understood and whether the proposal can be safely and sustainably accommodated.

59. The report also lists a very substantial package of section 106 contributions, including health, education, social care, waste, transport mitigation, the Hoo Peninsula strategic environmental programme and bird disturbance mitigation. It says these contributions are necessary to make the development acceptable in planning terms and that failure to secure them would result in planning harm.

60. Yet the report then assumes, for its own purposes, that the appropriate section 106 agreement will be entered into. That may be a convenient reporting assumption, but it means the report understates the significance of unresolved obligations and infrastructure delivery.

Chapter 14: The Report Relies Too Heavily on Later Conditions

- 61.** One of the clearest patterns in the report is the extent to which it seeks to defer key concerns to later conditions.
- 62.** The adjacent rebuttal for MC/23/1934 correctly identifies this as a weakness. Conditions are appropriate for genuine detail. They are not an answer where the underlying problem is whether the site is suitable in principle or whether the evidence base is complete enough to justify approval.
- 63.** Here, the report relies on conditions for ecology, drainage detail, lighting, route design, traffic calming, bus-related matters and more. That is too much deferral in a case where the site's sustainability and environmental performance are already under serious scrutiny.

Chapter 15: The Planning Balance Is Not Persuasive

- 64.** The report's final planning balance gives substantial positive weight to housing delivery and related benefits, but it does so on the basis of several premises that are, in our submission, too favourable to the applicant.
- 65.** If the emerging Local Plan is given too much weight, the made Neighbourhood Plan too little, the previous dismissed appeal too little, the active-travel and public transport case too much credit, and ecological/drainage concerns too much deferral, then the resulting balance is not reliable.
- 66.** The adjacent MC/23/1934 rebuttal reaches a very similar criticism: where the supporting analysis is too generous on emerging policy, too soft on transport/public transport, and too deferential to conditions, the final planning balance becomes unpersuasive. That same critique applies here.
- 67.** Members should therefore not accept the report's balancing exercise without qualification. A more cautious and policy-led balance would weigh much more heavily against the proposal.

Chapter 16: Conclusion

- 68.** For all of the reasons set out above, we respectfully support refusal of the application but object to the narrowness and over-generosity of the Case Officer Report.
- 69.** The report correctly identifies the major landscape and coalescence harm, but it materially weakens the Council's position by:
- (a) conceding that the principle is supported;
 - (b) overstating the weight of the emerging Local Plan;
 - (c) underusing the significance of the previous dismissed appeal;

- (d) overstating accessibility and public transport confidence;
- (e) understating ecological, drainage and infrastructure uncertainty; and
- (f) relying too heavily on later conditions and assumed section 106 delivery.

70. Planning Committee should therefore refuse the application and, in our respectful submission, do so on a broader and more robust basis than the single reason currently recommended.

Chapter 17: Suggested Reasons for Refusal

71. We respectfully suggest that the Planning Committee consider the following reasons for refusal.

72. Reason 1 – Principle of development / conflict with the development plan

The proposed development, by reason of its location outside the existing settlement boundary and within the countryside, would conflict with the spatial strategy of the adopted Medway Council Local Plan 2003, including Policies BNE25 and H11, and with the Hoo St Werburgh and Chattenden Neighbourhood Plan insofar as the proposal has not demonstrated compliance with the current statutory development plan when read as a whole. Only limited weight should be given to the submitted emerging Medway Council Local Plan because it remains at an early stage of examination, has not been found sound, has not been adopted, is unlikely to be adopted during 2026, and is subject to significant concerns raised by the examining Inspectors. The proposal would therefore represent an unjustified departure from the development plan.

73. Reason 2 – Transport, public transport and active travel

The proposal has failed to demonstrate that the site is, or can be made, genuinely sustainable in transport terms. In particular, the public transport case depends on unsecure and speculative future bus improvements; the authority is not currently in a position to secure the bus service improvement relied upon; the scheme's active-travel and public-transport performance depends materially upon future third-party delivery and unresolved later-stage infrastructure; and the proposal has not demonstrated convenient, inclusive and effective pedestrian and cycle connectivity for all users. The development would therefore conflict with Policies T1, T2, T3, T4, T5 and T6 of the Medway Council Local Plan 2003 and Policies HOO11 and HOO12 of the Hoo St Werburgh and Chattenden Neighbourhood Plan 2023–2040, as well as paragraphs 110, 115 and 117 of the NPPF.

74. Reason 3 – Ecology and wildlife impacts

The proposal has failed to provide a sufficiently robust and complete ecological evidence base at the point of determination, particularly in relation to breeding birds including skylark and nightingale, and has not demonstrated that there would be no unacceptable harm to biodiversity, ecological connectivity and nearby designated ecological receptors. The Council is not satisfied that these matters can properly be deferred to later surveys and later-stage mitigation by condition. The proposal would therefore conflict with Policies BNE35, BNE37, BNE38 and BNE39 of the Medway Council Local Plan 2003 and Policy HOO8 of the Hoo St Werburgh and Chattenden Neighbourhood Plan 2023–2040.

75. Reason 4 – Landscape and settlement separation

By reason of its siting, scale and encroachment into open land west of Hoo St Werburgh, the proposal would erode the open landscape separation between Hoo St Werburgh and Chattenden, harm the role of the Chattenden Valley corridor, and undermine a characteristic that the Hoo St Werburgh and Chattenden Neighbourhood Plan identifies as being of significant local value and which should be retained. The proposal would therefore harm the character and appearance of the area and contribute to coalescence and urban sprawl, contrary to Policies BNE1 and BNE25 of the Medway Council Local Plan 2003 and Policy

HOO8 of the Hoo St Werburgh and Chattenden Neighbourhood Plan 2023–2040, and, insofar as material weight is afforded to them, draft Policies SA8 and S4 of the emerging Medway Council Local Plan 2041.

76. And, If necessary, Reason 5 – Failure to secure necessary planning obligations

In the absence of a completed and binding planning obligation, the proposal fails to secure the infrastructure, mitigation and contributions that the Council itself considers necessary to make the development acceptable in planning terms, including but not limited to affordable housing, transport mitigation, health, education, waste, social care, strategic environmental programme funding and bird disturbance mitigation. The proposal would therefore conflict with paragraph 58 of the NPPF, Regulation 122 of the Community Infrastructure Levy Regulations 2010, and the policy framework relied upon by the Council in seeking those obligations.

77. For all of those reasons, we respectfully request that the Planning Committee resolve that, had the application remained before it, planning permission would have been refused on the above grounds.

Thank you for taking the time to read this representation.



George Crozer

Cllr. George Crozer (Ind)

Group Leader

Hoo & High Halstow Ward

Michael Pearce

Cllr. Michael Pearce (Ind)

Deputy Group Leader

Hoo & High Halstow Ward

Ron Sands

Cllr. Ron Sands (Ind)

Group Member

Hoo & High Halstow Ward

Written by Cllr. Michael Pearce (Group Planning Spokes).

Please note: this representation has not been signed by Cllr. Elizabeth Turpin and Cllr. John Williams - one of these Councillors will substitute for Cllr. Michael Pearce, who is a member of the Planning Committee, when the application is decided. Cllr. George Crozer, Cllr. Michael Pearce and Cllr. Ron Sands are Ward Councillors for where the application is located.

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