



**Councillor Michael Pearce**

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**Friday 4<sup>th</sup> April 2025.**

**Mr Dave Harris**

Chief Planning Officer

Local Planning Authority (LPA)

Medway Council

Gun Wharf Dock Road

Chatham

Kent

ME4 4TR

CC: Aaron Nicholls (Senior Planner) and Peter Hockney (Development Manager).

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

Dear Mr Dave Harris (Chief Planning Officer),

This letter concerns 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”.*

**Next steps following consultation with Active Travel England (ATE) and Sport England (SE).**

On Wednesday 12<sup>th</sup> March 2025, the Local Planning Authority (LPA)'s Planning Committee approved the above stated planning application, 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;**

ATE submitted their representation on 1<sup>st</sup> April 2025 and I have summarised their concerns with the planning application below:

- ATE has some concern that the connectivity of the site to a range of key amenities is very poor for pedestrians, both in terms of distance and the quality of routes, and it does not appear that this consideration has been appropriately addressed in the application documents or Committee report.
- Google mapping (May 2023) between the site and village centre shows numerous examples of pavement parking, narrow footways and street furniture that limits the safety, comfort and attractiveness of the route. In addition, walking times from the central part of the biggest land parcel would be around 1.5km/20 minutes to the village centre and 2.5km/34 minutes to the nearest school (The Hundred of Hoo Academy) such that the opportunity to travel to these destinations on foot is severely restricted and somewhat impractical for wheeled mobility.
- ATE notes that the Committee report references that there are several development sites to the west that have resulted in some improvements to the footways along Stoke Road. However, in the absence of an audit of this route in the applicant's Transport Assessment, ATE is unable to review the current condition of Stoke Road.

I agree with ATE that the distance and quality of sustainable routes has not been appropriately addressed in the application documents and Officer's (committee) report. My Design & Access Representation (dated Monday 3<sup>rd</sup> March 2025) provides an appraisal of the walking distances between each proposed parcel and the centre of Hoo. The figures contained in this appraisal demonstrate the proposal does not comply with the 15-minute sustainable neighbourhood concept, and the claimed 14-minute timescale by the applicant and the Officer's report is not credible. The representation by ATE confirms this to be the case and therefore, the application has not been properly appraised - this is important as it will affect the planning balance.

On Tuesday 21<sup>st</sup> January 2025, I requested Medway Council (Highways Authority) carry out a Road Safety Audit of Stoke Road between the centre of Hoo and Sturdee Roundabout. This is because several residents have contacted me from and

around Stoke Road, particularly from the new developments, concerning the poor and unattractive condition of the road for safety and sustainable transport purposes. Sections of Stoke Road include just a very narrow footpath on one side. The footpath/s are disorderly with no logic, including widening and shortening in places. There is a particular section where the path is narrow and the hedgerow is growing over the path, with a muddy and thin grass verge - yet the rest of the path has been recently widened and redesigned as part of the Thomas Aveling Road Junction. I agree with ATE that an audit needs to be carried out to determine the sustainability of the proposed development and because the safety, comfort and attractiveness of Stoke Road for walking and cycling is limited.

There is further evidence the application was not appropriately appraised. The Officer's report incorrectly states the site is **"not used for arable farming"** when the vast majority of the site is in fact active arable farmland. During the Planning Committee meeting and debate, the Case Officer was questioned about the description of the site and did confirm **"part of the site does form agricultural land"** and **"some of the site does form active farmland"**. However, the fact **the majority/most of the site** forms agricultural land (which is active) was not clearly explained to the Planning Committee.

ATE concludes their representation with the following statement:

***"As such, ATE expresses some concern with the isolated nature of the development but also notes that it is for the Council to weigh this against more favourable aspects. Where decision makers are satisfied with the quality of Stoke Road for pedestrian use and distances to key amenities, then ATE recommends that the Council should determine the application in accordance with the Committee decision; alternatively this consideration should be reviewed and again weighed in the planning balance."***

The decision maker here with this planning application is the Planning Committee - due to the fact the application came to committee in the first place and was not a delegated decision by Officers. Due to these important matters raised by ATE, including the application not being properly assessed by the applicant and Officer's report, the only reasonable course of action is for the application to be reappraised - taking into account the representation by ATE. Once reappraised and a new report created, the application should then return to the next available Planning Committee for decision.

The issues raised by ATE are significant and may change the planning balance - the only way of demonstrating if there has been a change in planning balance or not is with a reappraised application and Officer's report. The next Planning Committee meeting where the application is to be discussed should focus on the representation and issues raised by ATE. Ward Councillors, including myself, will focus specifically on these issues. Although it may be argued that the application is likely to still be approved, there's no absolute certainty it will. In the interests of completeness, the application should return to the Planning Committee for final decision.

What further compounds the need for the application to be reappraised and for it to return to Planning Committee is the representation and objection submitted by SE on Saturday 29<sup>th</sup> March 2025. I have summarised their concerns with the planning application below:

- A lack of use of a playing field, or part of, should not be taken as necessarily indicating an absence of need in an area. Such land can retain the potential to provide playing pitches to meet current or future needs.
- Part of the proposal is for new housing part of which will result in the loss of the complete site of 2.35 hectares of playing field. SE is not concerned about the housing and associated works which does not impact on the playing field.
- Medway Council does not currently have an update to date playing pitch strategy or built facility strategy. The site which SE is concerned about, part of the area of the land identified as parcel C, comprised of 2 adult football pitches, pavilion and car parking.
- The site was last used for football in 2011 and Medway Council are currently in the process of updating their Playing Pitch Strategy, but the last one published in 2019 indicates that the peninsula sub area where the site sits has no current undersupply of pitches of any size (hence it's lack of usage) but it does identify a future undersupply of junior 11v11, 9v9, 7v7 and 5v5. The affiliation data at the time identified there to be 478 teams in the Medway area. The current affiliation data suggests there is now 573 teams.
- The increase in population from this development will increase demand for pitch provision. The new playing pitch strategy will look at the impact of the increase population across the Local Plan period for the key pitch sports: rugby union, hockey cricket and football.
- The proposal will also increase demand for access to built facilities provision such as swimming pools and sports halls. Medway Council should seek contributions towards built facilities, in order to create a sustainable healthy community.
- The applicant has not proven that the playing field is surplus to requirements. The applicant has not provided replacement provision as part of this application. The applicant has therefore not satisfied the requirements of paragraph 104 of the National Planning Policy Framework (NPPF).
- With reference to SE's planning policy exceptions, the applicant has not satisfied any of our planning policy exceptions. SE's planning policy exceptions E1, E4 and E5 are similar to criteria a, b and c of NPPF paragraph 104 respectively. SE's planning policy exception E2 is for ancillary facilities to a playing field, which housing is not. SE's planning policy exception E3 is for land not capable of forming a playing pitch, which given there were two adult football pitches, as well as a pavilion and car parking to support the pitches, the proposal does not meet this exception.

- In Section 6 Planning Analysis, of the applicant's Planning Statement, they have not set out any health benefits of the proposal and in the draft heads of terms they do not acknowledge the need to provide for either formal/informal indoor or outdoor sports provision, to create a healthy community, which is very disappointing.

SE objects to the planning application for the following reasons:

- SE objects to the application because it is not considered to accord with paragraph 104 of the NPPF or Sport England's planning policy exceptions.
- For clarity, SE only objects to the housing and associated works which are on the playing field site.
- Potential to overcome the objection - if the applicants were to remove the playing field site from the red line development boundary SE would have no objection to the remainder of the application.
- Or if the applicants were to replace the area of playing field in a suitable location.

SE also requests to be notified in advance of the publication of any committee agenda, report or committee date.

To ensure a 'lawful', 'fair' and 'reasonable' planning decision is made (Town and Country Planning Act 1990 and the Planning & Compulsory Purchase Act 2004 etc.), the only reasonable course of action is for the planning application to be brought back to the next available Planning Committee meeting, following reappraisal and the assessment/inclusion of the representations submitted by ATE and SE. The significant concerns raised by these statutory bodies may change the planning balance and the only way of confirming this is with a reappraisal of the application.

I note a Decision Notice (legal planning permission) has not been issued to the applicant at the time of writing this letter.

Best wishes and kind regards,

*Michael Pearce*

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