

From: planningcomments@staffs Moorlands.gov.uk
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Application Reference No. : SMD/2026/0250 Site Address: John Munroe Independent Hospital Reacliffe Road
Rudyard Staffordshire ST13 8RU Leek Comments by: Jonathan Ledner

From:

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Submission: Objection

Comments: I wish to object to the above planning application for the proposed redevelopment and change of use of the former John Munroe Hospital from a Class C2 Residential Institution to a Class C2A Secure Residential Institution.

My objection is not based upon opposition to mental healthcare or the provision of secure treatment facilities. Mental health services form an essential part of our healthcare system and appropriate secure accommodation is required for patients who need specialist care.

My objection is instead based upon the suitability of this particular location for such a facility and whether the applicant has demonstrated that the proposal would protect neighbouring land uses, particularly two schools immediately adjoining the site. I believe the application fails to provide sufficient evidence to demonstrate that the proposal represents sustainable development or adequately safeguards neighbouring communities.

1. Fundamental Change of Use

Although the applicant presents the proposal as the reopening of an existing hospital, the application seeks a material change from a Class C2 institution to a Class C2A Secure Residential Institution.

This distinction is significant.

A C2A institution is intended for secure accommodation where occupants are subject to restrictions on their liberty. It is fundamentally different in planning terms from the previous use of the site.

The Council should therefore consider this application as a proposal introducing an entirely different planning use rather than simply reopening a hospital.

The previous lawful use of the site should not be relied upon as justification for approving a significantly more intensive and secure form of institutional development.

2. Immediate Proximity to Two Schools

The proposed institution directly adjoins:

¿ Horton Lodge Community Special School

¿ Horton St Michael's CE First School

This is perhaps the most important planning consideration.

These schools educate very young children together with children who have additional educational needs and vulnerabilities.

The applicant has not demonstrated how the operation of a secure institution immediately adjacent to these schools would protect safeguarding interests over the lifetime of the development.

The planning documents should include a detailed assessment explaining:

- ¿ why this location has been selected;
- ¿ why sites further removed from schools were discounted;
- ¿ how safeguarding has been considered;
- ¿ how emergency procedures would operate during school hours;
- ¿ what communication protocols exist between the operator and neighbouring schools.

Without this information the Council cannot reasonably conclude that the proposal is appropriate.

3. Lack of Demonstrated Need for This Location

The application explains why secure accommodation is required.

However, it does not adequately explain why this particular site is appropriate.

The planning system requires more than demonstrating a need for a service.

It must also demonstrate that the chosen location is suitable.

Given the exceptional sensitivity of neighbouring uses, the burden should rest firmly upon the applicant to justify this location.

4. Security Assessment

The application seeks permission for secure accommodation.

However, little detailed information appears to have been provided regarding:

- ¿ perimeter security;
- ¿ escape prevention measures;
- ¿ emergency response procedures;
- ¿ patient transportation arrangements;
- ¿ police liaison;
- ¿ procedures for absconding patients;

¿ procedures protecting neighbouring schools.

These matters should not be left until after planning permission is granted.

They are fundamental to determining whether this site is suitable.

The Council should require a comprehensive Security Management Plan before determining the application.

5. Previous History of the Site

The former John Munroe Hospital closed following serious regulatory concerns identified by the Care Quality Commission.

Those concerns related to governance, leadership, safety systems, maintenance and overall management.

Whilst these failings relate to the previous operator rather than the current applicant, they demonstrate that this site has previously experienced significant operational shortcomings.

Given this history, it is reasonable for the Council to apply enhanced scrutiny to any proposal to reopen the facility, particularly where the proposed use is more secure than the previous hospital.

6. Experience of the Proposed Operator

Avora Healthcare Ltd appears to be a relatively new company established in 2023.

From publicly available information there appears to be little evidence of previous operation of secure mental health hospitals.

This is not itself grounds for refusal.

However, given the sensitivity of the proposed use, the Council should be satisfied that appropriate governance, management structures and operational expertise will exist before granting permission.

7. Community Confidence

Planning decisions should also consider the effect upon neighbouring communities.

Many parents will understandably have concerns regarding the siting of a secure institution immediately adjoining schools.

Whether those concerns ultimately prove justified or not, they are capable of affecting:

- ¿ confidence in local schools;
- ¿ perception of community safety;
- ¿ recreational use of surrounding public spaces;
- ¿ residential amenity.

These effects deserve careful consideration.

8. Public Rights of Way

The surrounding countryside is extensively used by walkers, cyclists and families.

Public rights of way exist close to the development.

The application should demonstrate how secure operation would coexist with these routes.

9. Traffic and Operational Activity

The proposal is likely to generate different traffic movements from the previous hospital.

These may include:

- ¿ secure transport vehicles;
- ¿ patient transfers;
- ¿ ambulance movements;
- ¿ emergency service attendance;
- ¿ staff shift changes.

The cumulative impact should be fully assessed.

10. Future Intensification

Planning permission should not create an unrestricted ability to alter patient categories in future.

If permission is granted, appropriate planning conditions should define:

- ¿ patient numbers;
- ¿ security category;
- ¿ operational limits;
- ¿ external lighting;
- ¿ perimeter security works;
- ¿ landscaping.

11. Planning Balance

The applicant has identified benefits including healthcare provision, employment and reuse of a vacant building.

These benefits are recognised.

However, they must be weighed against the unique characteristics of the site.

Very few secure institutions are located immediately adjacent to two primary-age educational establishments.

This proposal therefore deserves an exceptionally high level of scrutiny.

Conclusion

This objection should not be interpreted as opposition to mental healthcare or to individuals experiencing mental illness.

Rather, it reflects concern regarding the suitability of locating a secure institutional use immediately adjacent to schools attended by young and vulnerable children.

The applicant has not, in my opinion, demonstrated that:

- ¿ the location is appropriate for a C2A institution;
- ¿ safeguarding implications have been fully assessed;
- ¿ security arrangements have been adequately explained;
- ¿ neighbouring schools have been sufficiently considered;
- ¿ the long-term impacts on community confidence and public amenity have been addressed.

Accordingly, I respectfully request that Staffordshire Moorlands District Council refuses this application.

Should the Council nevertheless be minded to approve the proposal, I request that determination be deferred until comprehensive evidence has been provided addressing:

1. A full Security Management Plan.
2. A Safeguarding Impact Assessment prepared in consultation with neighbouring schools.
3. Staffordshire Police's comments on the proposed operation.
4. Emergency response procedures.
5. A detailed assessment of patient categories and operational restrictions.
6. Planning conditions preventing future intensification without further planning permission.

Given the exceptional sensitivity of this location, I believe the Council owes both existing residents and the neighbouring schools the highest possible standard of scrutiny before determining this application.

For these reasons, I respectfully request that planning permission be refused.

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