

# Theatres fit for the **future**



Ref.: TC/1853

19 June 2026

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**Application:** MC/26/0906

**Site:** 12 Star Hill Rochester Medway ME1 1XB

**Proposal:** Change of use from residential and theatre (Class C3 and Sui Generis) to five residential units (Class C3) together with construction of three residential townhouses - demolition of existing 20th century addition

## **Remit:**

Theatres Trust is the national advisory public body for theatres. We were established through the Theatres Trust Act 1976 'to promote the better protection of theatres' and provide statutory planning advice on theatre buildings and theatre use in England through The Town and Country Planning (Development Management Procedure) (England) Order 2015, requiring the Trust to be consulted by local authorities on planning applications which include 'development involving any land on which there is a theatre'.

## **Theatres Trust**

22 Charing Cross Road, London WC2H 0QL

**Telephone** 020 7836 8591 **Email** [info@theatrestrust.org.uk](mailto:info@theatrestrust.org.uk) **Website** [theatrestrust.org.uk](http://theatrestrust.org.uk)

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**Chair** Dave Moutrey OBE

**CEO** Joshua McTaggart

**Trustees** Vicky Browning OBE, Anna Collins, James Dacre, Liam Evans-Ford, Stephanie Hall, Annie Hampson OBE, Louisa Harris, Mark Johnston, Adam Knight, Tracy Ann Oberman MBE, Lucy Osborne, Saratha Rajeswaran, Michèle Taylor MBE, Katie Town

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## **Comment:**

Thank you for consulting Theatres Trust on this application for planning permission. It seeks change of use from theatre (Sui Generis) to residential (C3) at Royal Function Rooms, which historically was Theatre Royal Rochester, along with associated alterations and the construction of three townhouses.

There has been a theatre at this site since 1791 when the original Theatre Royal was built by the Mrs Baker Company, who at the time had successfully toured throughout Kent. A private home was included within the scheme. After Mrs Baker's death the theatre was purchased and altered in 1842, and significantly remodelled in 1851. The final performance was in 1894 after which it was altered for use as a Conservative Club but with continued provision for live performance. The façade is that of the late-nineteenth century works, although elements were lost when Star Hill was widened. To the rear, the building appears to be the shell of an eighteenth century theatre which would make it a rare survivor. This building is a Grade II listed heritage asset within the Star Hill Conservation Area, and is located directly adjacent to the neighbouring Star Hill to Sun Pier Conservation Area.

The performance space has more the character of a hall or church which has been converted to a theatre than a historic theatre, nonetheless it was a popular venue which hosted live music, comedy and other events. There was a secondary smaller room known as the Billabong Club. Operated as the Royal Function Rooms for many years, it closed at the end of 2022 because its operator was given notice to vacate. This has had a negative impact on local cultural provision. There is demonstrable interest in retaining this venue, marked by a high number of objections to this application and persons having contacted us. We understand there are efforts to designate this building as an Asset of Community Value.

Paragraph 98 of the NPPF (2024) seeks planning decisions to plan positively for facilities such as this one, including to guard against unnecessary loss. Policy L1 of the Medway Local Plan (2003) does not permit loss of leisure facilities, defined as including arts and cultural venues, unless there is (i) replacement provision of equal or better standard, (ii) that there is no longer a need for the facility, and (iii) that the site is allocated for development in the Local Plan.

Emerging Policy T13 of the Medway Local Plan 2041 (Submission Version) supports and promotes development where it enhances Medway's cultural life and extends the

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existing cultural offer. Emerging Policy T29 of that document recognises the importance of community and cultural facilities and the need for an appropriate range of facilities as a key component of sustainable development. It seeks to protect and enhance existing facilities, services and amenities that contribute to the quality of life of residents and visitors. It has a presumption against loss of such facilities subject to similar criteria to existing Policy L1. Whilst these emerging policies carry limited weight at this stage, they are compatible with existing adopted policy and the NPPF.

Paragraph 1.4 of the applicant's Heritage Statement asserts the development and alterations of this site will "facilitate the continued and viable use of the building". In actual fact this facility closed only because the operator was given notice, not because it failed. It was already in what was a long-standing and seemingly viable use consistent and compatible with the building's form and function, for which no evidence has been provided that this could not continue in future. The Planning Statement is wholly inadequate in evidencing loss in line with policy, and in responding to the council's pre-application advice which seemingly asked the applicant to demonstrate the current and alternative cultural/community uses were no longer required and viable.

Paragraph 4.2.2 of the Planning Statement (repeated within the Design & Access Statement) does not test continued theatre/live performance use at all. It goes first to 'alternate uses' including 'cinemas, swimming pools and indoor/outdoor sports areas'. It states these are "not feasible due to our site's size restrictions and the significance of the theatre space and stage which limit our ability to significantly re-plan for other leisure uses without detrimental effect to the historic building". Having recognised the form and significance of the theatre space, it is challenging to comprehend why that sort of use could not have been considered first. The reference to swimming pools and outdoor sports areas in this context suggests an unserious attempt by the applicant to conduct this exercise.

As the above paragraph continues it states information that could be construed as misleading, as the wording used suggests the venue has been empty since 2019. In fact, as noted above it has been empty only since the end of 2022 and that is because the operator was forced to vacate. It references Medway Little Theatre and other undefined venues and halls as alternatives, but it does not appraise the compatibility and availability of those to absorb lost and displaced programme and offer from this venue. That notwithstanding, relevant policy is clear there should be no 'unnecessary loss' and facilities of this nature should be retained.

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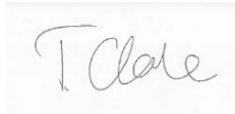
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There is no evidence the Royal Function Rooms are surplus to requirements, neither is this a facility which has been re-provided or a site which has been allocated for alternative development. As set out above, public interest is such that there is clearly interest, need and demand for retention. As such, this proposal is contrary to relevant policies and would constitute 'unnecessary' loss.

We therefore object to the granting of planning permission.

To overcome this objection the applicant would need to provide detailed and robust evidence that all efforts have been made and exhausted to return this site to use as a theatre/live performance venue.

Please contact us if we may be of further assistance or should you wish to discuss this representation in greater detail.



Tom Clarke MRTPI

National Planning Manager

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