[redacted]

22 September 2025

Planning Application 20250876 – Planning in Principle for the erection of up to 9 Dwellings

Please register this letter as my **Objection** to this Planning Application.

Walnut Hill Nursey operated as a plant nursery up until about 2 years ago when it was purchased by its current owners. Since the change of ownership this site has been developed and used as a commercial depot. The impact on the local area has been extensive. Despite obtaining no Planning Permission for developments or change of use, this site has continued to be used as a commercial depot. An Enforcement Notice covering the use of the whole property was appealed, but the Enforcement Notice was upheld by a Planning Inspectorate with deadlines for compliance set in two stages. Non-compliance at both stages has occurred. The disregard for and the manipulation of the planning process to prolong the commercial use has been unrelenting.

Historically this site had one residential property, which in due course became the current single building at the front of the site which was approved to be used in connection with the agricultural use of the land. Given the planning history and the unauthorised change of use under the current ownership I do not feel dividing the site to enable Planning in Principle (PIP) for up to 9 houses at the rear of the site, whilst retaining commercial use to the front is appropriate. PIP are intended for small sites developments specifically under one hectare. The application states the proposed site extends to 0.99 but this relates to only a part of the site, the front area being subject to a separate Planning Application (Planning Application 20250864). Walnut Hill Nursery as a whole is a 3.3-acre site (1.335 Hectare). Given that this proposal will jointly use the single highway access point and access is required through the operations at the front of the site, this PIP would materially affect the whole site. Therefore, I feel this application cannot be considered in isolation and should be considered in the context of how the whole 3.3 acres will be developed and used and the impact on the local area as a single entity.

The application states that the 9 houses are considered to be in keeping with the size of the site as well as nearby dwellings and will not result in overdevelopment or intensification. Not only do I strongly disagree with this statement, but 9 properties is also the maximum number of properties allowable under a PIP application. It is my opinion that this shows the application process is being used to its maximum limit and no true regard has been given for the appropriateness or the impact of this development.

Not withstanding the above, we would also like to make the following comments:

1. The use of the front of the site is subject to its own separate Planning Application, and the use of the whole site is subject to an Enforcement Notice for which non-compliance has been evidenced and ongoing. Given recent planning history and that the applicant seeks to retain the use of the front of the site for commercial use, it is not an unreasonable assumption that the intention is not to support any unmet Housing Supply but to secure this residential status for an as yet unknown rationale for their own benefit. A mixed use of commercial and multi dwelling

residential use of this site is not only wholly inappropriate for its location but totally unsustainable.

2. In addition to the overdevelopment in an inappropriate location, due regard needs to be given to the fact Walnut Hill Road and the approach roads are already severely impacted by the number of vehicles currently attending this site. Safety concerns have been raised by local residents in this regard. The necessity for vehicles to reverse, sometimes extensive distance, to facilitate the passing of 2 vehicles is now a frequent occurrence. Should multiple vehicles meet at the same point which also regularly occurs now, the road is at a standstill until all vehicles are manoeuvred. This involves multiple vehicles reversing to passing points and utilizing multiple driveways simultaneously. This development would further exacerbate this to a dangerous level.

3. This proposal would be totally out of keeping and would be a major overdevelopment in this location that would not align with the established character of Walnut Hill Road. There are currently only 5 residential dwellings each on its own large plot with direct access on to Walnut Hill Road. This application would represent a significant increase in the number of dwellings of up to almost 200% and would be inappropriate intensification of dwellings changing the entire outlook of this small green belt rural hamlet. This development although at the rear of the site would be very obvious from the road and would affect neighbouring properties whilst seriously impacting on the rural scene.

4. Walnut Hill Road is not a Sustainable location for this development. Walnut Hill Road is a rural country lane, single in width, no pavements, minimal lighting, on a steep gradient and winding in nature with hedgerows defining the road. Nash Bank, the initial part of Downs Road, Stony corner and the unmade portion of Longfield Avenue, the roads all leading from Walnut Hill Road, also all have no pavements, are single width and have minimal lighting. Minimal passing places exist, with only one side road between Walnut Hill Road and the A227.

5. Due to the rural nature of this area and the local rural roads, great reliance has to be placed on using vehicles due to the distance to any amenities and facilities and the limited infrastructure. The bus stops on the Wrotham Road can only be reached using Nash Bank, which has a 60mph limit and cannot be considered a safe walking route. Crossing the Wrotham Road to access the bus stop on the opposite side is perilous as it on the curve of a blind bend with a 50mph speed limit. Both bus stops are sited on small grass verges close to the busy road and are hardly ever used due to their location. The steep gradients and other factors as detailed earlier mean the bus stop in Downs Road is not considered to be walkable. Bus services are also limited. The Train Station would also predominately require using a car. There are no paths on Wrotham Road for most of the distance and no cycle lanes on this 50mph trunk road. Turning right onto the Wrotham Road from Nash Bank joining what is a very busy road is also blind. Accessing the Wrotham Road from this position is generally avoided by locals.

6. The entrance to the site is restricted in size with one single vehicle width entrance/exit and does not have clear site lines for exiting the site. Extensive reports and responses have been made by local residents regarding concerns for highway safety and the huge increase in traffic volume being generated by this site since its unauthorised change of use. The HGV's were only one

component of concerns, with high volumes of traffic still remaining. It should be noted that an interim Operators licence still technically exists for this site, as it is pending a decision from the upper Tribunal due to an appeal of the decision made by the Traffic Commissioner that the site was unsuitable.

In relation to the Proposed Residential Development Transport Statement, I would like to respond as follows:

1.4 P3 - **"the proposal will result in a reduction in commercial and HGV movements at the site and local area network when compared to the plant nursery.....The proposal should therefore be considered beneficial in terms of highway safety"** - The use of this site as a plant nursery operated for a significant number of years and the volume and type of traffic it generated had little to no impact at the site and on the local area, and generated no concerns. The current use of the site as a commercial depot is subject to Planning Enforcement upheld by the Planning Inspectorate, and has generated huge concern for the impact this depot has on the safety of the roads due to vehicle movement numbers . How then can a benefit be assumed by comparing this proposed development to the Plant Nursery whilst ignoring current traffic volumes and safety concerns resulting from the current use as a depot. How can the proposed retention of the commercial use of the front of the site, which generates all the traffic volumes associated with this site, be excluded from this comparison! The traffic generation statistics calculated for the plant nursery have also been produced using assumptions and TRICS data that are inaccurate. It can be stated categorically that the weekday vehicle movement for the plant nursery was nowhere near 74 and did not involve any regular HGV activity.

1.4 P4 - Whilst the review of PIC data per the application does not show any accidents recorded for the most recent 5 year period, this does not mean no accidents or incidents have occurred just that none have been reported. No reports of concern for the safety of Walnut Hill Road were made until the change of ownership and change of use at Walnut Hill Nursery. Since the change in ownership the traffic volumes have increased significantly, and accidents and incidences are known to have occurred and can be evidenced, they just haven't been reported.

1.4 P5 - It is incorrect to state that Walnut Hill Road and Nash bank benefit from a significant number of passing spaces. Very few spaces exist and of those only a couple provide enough space when attempting to pass larger vehicles without the risk of damage to vehicles by encroaching onto verges and into the hedgerow. The edge of the road has also seen significant erosion during the last 2 years. Private driveways identified in this report as passing places is not correct. Private driveways are private property

2.4 The recorded opening hours for the plant nursery are incorrect and to say it traded gives a false representation of the actual activities at the Plant Nursery, thus any statistical data obtained using these assumptions are incorrect and should not be given any weight. This is an area that has been discussed extensively under other previous planning applications for this site. A number of the existing structures within the application red line boundary do not have planning permission or have refused retrospective planning. There is also no detail as to how the 500 sqm has been calculated.

2.5 The statistical analysis being applied to this application are based on predictions and assumptions and cannot be relied on or given any due weight.

2.9 The Audit of the highway route between the site and the A227 and the Drawing 21518/01 identified 17 suitable passing places. Private driveways are not passing places and there is only side road entrances at either end of Walnut Hill Road. This is a rural lane and the reality from someone that regularly uses the road is that there are very few highway passing points from which 2 cars can easily pass and even less if larger vehicles are involved.

2.11 Walnut Hill Road has been the subject to serious safety concerns since the change of ownership of this site. Just because CrashMap shows no data it cannot be concluded that no safety issues exist. Local residents can confirm that incidents/accidents/near misses and vehicle damage have occurred since the change of use at Walnut Hill Nursery to a commercial depot.

2.12 Walnut Hill Road cannot be defined as lightly trafficked since the change of use at Walnut Hill Nursery. Again, statistical accident data cannot be considered as reliable for the same reason as Crashmap.

3.5 The level of traffic generation from this PIP calculated using Trics Comparison sites is reported as 45 additional vehicle movements each weekday. Whilst not accepting any accuracy of these statistics 45 vehicle movements cannot be viewed as a negligible increase. This data also cannot be compared with the Traffic Generation figures calculated and reported for the plant nursery as these are based on inaccurate assumptions. The impact of this PIP on traffic generation statistics should also in my opinion include the vehicle movements generated from the current depot and the proposed retained use of the front of the site. This again seems to have been ignored within the PIP impact statements even though they relate to the same site. The reality is that the volume of vehicle movements from this site already impacts extensively on the local area and the safety of local roads and the further vehicles resulting from this PIP would impact negatively on local roads. To state that this proposal over the weekday would result in significant reduction in traffic amounting to 29 vehicles a day when compared to the existing site use, only proves that the statistics in this report are skewed and should be given no weight.

3.10 This would not be a solely residential site but a mixed use with the authorised use of the front of the site still subject to its own planning application, so to state that this development will result in a significant daily reduction in overall site traffic levels and would fully address highway safety concerns when compared to the plant Nursery is a wholly inappropriate conclusion and statement based on skewed statistics.

I strongly object to this Planning Application. This PIP application is not appropriate for this development, and the site of Walnut Hill Nursery needs to be considered as a whole and a single entity. The site is not appropriate for this proposed development and would not respect the openness of the greenbelt and would be in direct conflict with the rural character of Walnut Hill Road. As detailed above this proposal cannot be considered a sustainable development and strong arguments exist to support this fact.

Please acknowledge your receipt of this document

Regards