

Comments summary

Dear Sir/Madam,

Planning Application comments have been made. A summary of the comments is provided below.

Comments were submitted at 22/03/2026 10:19 PM from [REDACTED]

Application Summary

Address:	Land North Of Camer Road Meopham Gravesend Kent
Proposal:	Outline planning application for up to 725 dwellings (Use Class C3), a new two-form entry primary school (Use Class F1), a Local Centre (up to 500sqm of Class E floorspace), the provision of Public Open Space including sport and recreation facilities alongside associated access, landscaping, parking, and infrastructure; with all matters reserved except for access.
Case Officer:	Mrs Katherine Parkin

[Click for further information](#)

Customer Details

Name:	[REDACTED]
Email:	[REDACTED]
Address:	[REDACTED] Camer Street Sole Street

Comments Details

Commenter Type:	Neighbour
Stance:	Customer objects to the Planning Application

Reasons for comment:

Comments:	The proposal for 725 dwellings and a primary school represents an unsustainable incursion into high-performing Green Belt and a violation of proactive statutory duties regarding the Kent Downs National Landscape. 1. Fundamental Rebuttal of the "Grey Belt" Classification The applicant's attempt to reclassify this site as "Grey Belt" in the Planning Statement (DL02) to avoid the "Very Special Circumstances" test is legally and technically flawed : -The Three-Purpose Test: Under the NPPF (December 2024), Grey Belt status is restricted to land that does "not strongly contribute" to checking sprawl, preventing merging, or preserving historic settings. The Gravesham Green Belt Study (2018) officially designates Parcel 20 (covering this site) as making a "Significant Contribution" to these purposes. -National Landscape Exclusion: The NPPF explicitly excludes land from the Grey Belt where policies in Footnote 7-which includes National Landscapes (formerly AONBs)-provide a strong reason for refusal. As this development causes "considerable change" and "direct loss of open countryside" within the setting of the Kent Downs, it is disqualified from Grey Belt status by national policy. 2. Legal Breach of Section 245 "Duty to Further" (LURA 2023) Section 245 of the Levelling-up and Regeneration Act 2023 creates a new,
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proactive statutory requirement for the Council to "seek to further" (not just "have regard to") the conservation and enhancement of the National Landscape.

-Active vs. Passive Duty: The Kent Downs National Landscape team (March 2026) has confirmed this is an active duty requiring measures beyond mere mitigation.

-Policy Conflict: The 3-story "hard urban edge" in the Concept Masterplan (DL05) actively undermines the Kent Downs Management Plan 2021-2026, specifically violating Policy AEU13 (conserving character) and AEU14 (protecting the Public Rights of Way network).

3. Green Belt Coalescence (Purpose 2)

The masterplan fills the final rural gap between the distinct settlements of Hook Green and Sole Street. This results in coalescence-the merging of villages into a continuous suburban corridor-which is a fundamental breach of Green Belt Purpose 2. The Gravesham Green Belt Study confirms the western parts of this parcel are "particularly important" in maintaining this separation.

4. Infrastructure: The "School as a Trojan Horse"

The applicant offers a primary school as a "Very Special Circumstance" to justify the development. This fails technical scrutiny:

Pretext for Density: The school is an on-site mitigation necessitated solely by the population spike of the 725 new homes, rather than a community benefit for existing residents.

-Urbanization of Rural Lanes: The proposed "Carriageway Widening" and roundabout on Camer Road-which currently has no significant road markings and is rural in character-would destroy ancient hedgerows and the "Kentish Vernacular" in direct violation of the Rural Streets and Lanes Design Handbook.

5. Irreversible Harm to Heritage Assets

The objection is submitted on behalf of a resident of a Grade II listed building on Camer Street, afforded "Great Weight" protection under NPPF Chapter 16.

-Setting and Experience: Following the legal precedent of Catesby Estates Ltd v Steer, the setting of a listed building is defined by the experience of the asset in its landscape. The proposed density of 40 dph represents an alien typology that terminates the historic connection between the village and the open downs.

-Structural Vibration Risk: Multi-year construction traffic and HGV movements pose a direct threat to the foundations of Grade II listed properties on Camer Street. Vibration from heavy machinery can cause structural damage to fragile historic building fabric.

6. Technical and Environmental Constraints

Southern Water Restrictions: Their formal response (March 2026) places restrictions on tree planting near sewers and water mains, which fundamentally undermines the applicant's proposed landscape screening and mitigation strategy.

-Water Stress: Gravesham is a "water-stressed" area where supply comes from chalk aquifers. Southern Water requires strict Sustainable Drainage (SuDS) implementation to prevent overloading the network.

-Tranquillity and Dark Skies: Light spill from a development of this scale will permanently degrade the nocturnal environment of the National Landscape, a feature valued by 74% of residents.

Conclusion

Application 20260207 fails the "Grey Belt" test, violates the proactive duty under LURA 2023, and causes irreversible harm to the setting of the Kent Downs and local heritage assets. The Council is urged to refuse the application to protect the spatial integrity of Meopham and Sole Street.

