

Comments summary

Dear Sir/Madam,

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

Comments were submitted at 26/09/2025 4:41 PM from [REDACTED]

Application Summary

Address:	Blackthorn Farm Wrotham Road Meopham Gravesend Kent
Proposal:	Outline planning application for up to 100No. residential dwellings (including affordable housing), with all matter reserved except for access and creation of a new access from A227/South Street.
Case Officer:	Ms Amanda Cue

[Click for further information](#)

Customer Details

Name:	[REDACTED]
Email:	[REDACTED]
Address:	[REDACTED] Gravesend Kent

Comments Details

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

Reasons for comment:

Comments:	<p>I object to this proposal on the grounds that it constitutes inappropriate development in the Metropolitan Green Belt and fails to demonstrate the "very special circumstances" required by the National Planning Policy Framework (NPPF) to clearly outweigh the resulting harm, including adverse air quality and ecological impacts.</p> <p>1. Conflict with Green Belt Policy: Harm to Openness and Purposes The site is entirely within the Green Belt, and this inappropriate development, by definition, causes harm. The applicant's reliance on classifying the land as "Grey Belt" is contested by the Council's own strategic evidence:</p> <p>Encroachment: The Gravesham Stage 2 Green Belt Study (2020) rated the parcels encompassing the site (CG2 and CG3) as making a 'Significant' or 'Relatively significant' contribution to safeguarding the countryside from encroachment (Purpose c). This evidence of harm must be given substantial weight.</p> <p>Openness and Built Form: Introducing up to 100 dwellings, roads, and infrastructure will fundamentally diminish the spatial and visual openness of the site. The application acknowledges that the building volume for the construction phase is estimated to be 12,000m³ - 75,000m³, representing a significant and permanent intrusion of built form.</p> <p>Failure of VSC: The justification relies heavily on housing need, but this alone does not constitute "very special circumstances" sufficient to clearly outweigh the substantial harm to the Green Belt and its purposes.</p> <p>2. Unmitigated Air Quality and Environmental Impacts The development fails to provide convincing evidence that it will not result in adverse impacts on air quality for local human and ecological receptors.</p> <p>Traffic Emissions: The operational phase is predicted to generate 464 AADT</p>
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Light-Duty Vehicles (LDVs) on the local road network. Although this falls narrowly below the indicative screening threshold of 500 AADT for a detailed assessment, it represents a significant and permanent increase in vehicles accessing the A227 South Street.

Ecological Harm (Operational): Road traffic increases are expected to affect ecological receptors (SSSI and Ancient Woodland) located within 200m of the road links. The simplistic screening out of further assessment ignores the cumulative effects of increased traffic on the delicate local habitats.

Financial Mitigation of Harm: The commitment to a Damage Cost of £25,893 over a 5-year period acknowledges that the development will cause harm that necessitates financial compensation, despite being labelled "insignificant" in its overall impact.

Construction Dust: The construction phase is rated at worst as 'Medium Risk' for dust soiling, directly impacting nearby high sensitivity residential properties and the adjacent Ancient Woodland. This constitutes a substantial, if temporary, amenity and environmental harm.

3. Undermining Sustainability and Infrastructure Capacity

The location is not demonstrably sustainable without significant reliance on private vehicles, and the development will strain local resources.

Infrastructure Strain: The creation of up to 100 dwellings will place an unacceptably high demand on strained local services. The need for primary (28 places) and secondary (20 places) school capacity alone is a significant burden. Relying on financial contributions to mitigate this burden is unacceptable when the Council faces persistent challenges in delivering critical infrastructure.

Site Suitability Flaw: The application asserts the site is suitable for residential use, but this assessment is limited primarily to local air quality and fails to comprehensively demonstrate how the existing roads, local services, and general capacity of the Culverstone Green area can absorb a development of this scale.

Conclusion

The minimal benefits of the proposal are clearly and demonstrably outweighed by the aggregate harm to the Green Belt, the degradation of local air quality, the demonstrable increase in traffic emissions, and the strain on essential local infrastructure. The application should be refused as it is contrary to the NPPF and fails to provide adequate justification for development in this sensitive Green Belt location.

Kind regards