

Comments summary

Dear Sir/Madam,

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

Comments were submitted at 04/03/2025 5:29 PM from [REDACTED]

Application Summary

Address:	St Josephs Convent Of Mercy Hillside Drive Gravesend Kent DA12 1NY
Proposal:	Erection of a 4x 4 bedroom houses with garage, home-office and gardens on the land north of the Convent of Mercy Gravesend. Works include an extension of Hillside Drive ending in a new turning area, private driveway and off-road parking for each house, an electrical substation, and a managed biodiversity area along the north-east boundary of the site.
Case Officer:	Mrs Alison Webster

[Click for further information](#)

Customer Details

Name:	[REDACTED]
Email:	[REDACTED]
Address:	The Turnstones Gravesend

Comments Details

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

Reasons for comment:

Comments:

I would like to register my objection to the current application.

I think the proposal is not being realistic in how it is presenting some of the supporting data. For instance, the Transport Statement claims this -

In summary, this Study finds the proposed cumulative daily trip generation for both proposed conversion and four new dwellings is 66 fewer than the daily trip generation of a fully occupied convent in its current configuration and therefore the proposed development provides a betterment in highway impact terms, as the new daily trip generation to / from the site would be reduced.

This is simply not a true reflection of the actual reality as it currently stands.

I understand that IF the convent were fully occupied and IF those potential occupants were travelling in a normal way, then this data COULD be accurate.

But I understand that there are currently only 7 Sisters in occupation and of these I believe only two currently drive (it might only be one).

I think if they are going to use data to try and support their claim then it should be an accurate representation of the facts as they currently are. NOT what they COULD be. Then we can make an informed opinion.

The same goes for the bio-diversity report and claims.

Suggesting that building 4 houses with gardens and parking space over what is currently a non-polluted grassy area with hedgerows, mature trees and shrubs will be an improvement is simply nonsense and doesn't require a detailed

biodiversity report to disprove when simple common sense will do.

To suggest that the development will improve biodiversity is again just manipulating the data.

For instance:

The Biodiversity Net Gain (BNG) assessment concluded that the existing baseline biodiversity value of the site was 0.08 Habitat Units, consisting of:

- 0.02km of non-native and ornamental hedgerow auto assigned poor condition providing 0.02 hedgerow units.
- 0.03km of native hedgerow in poor condition providing 0.06 hedgerow units.

In the baseline assessment rating the hedgerows on the site are assigned a baseline rating of POOR. To receive this rating one aspect of the criteria is that they are below a certain height. The gardens and hedgerows have been extensively cut back in the last year, so this is again clear manipulation of the environment to help support the claims of biodiversity improvement.

The proposals suggestion that a 25.52% Bio-diversity Net Gain in hedgerow units across the site is simply manipulation of the data.

There is also a similar claim about the modified grassland.

Another aspect of the Bio-diversity report states:

4.0 MEASURES TO ACHIEVE MINIMUM REQUIRED LEVELS OF BNG

4.1 The scheme currently meets the mandatory minimum 10% net gain in hedgerow units with all hedgerow trading rules satisfied.

4.2 Proposal currently result in a deficit of 0.3 habitat units. Trading rules for hedgerows have been met, however trading rules for both medium and low distinctiveness habitats are not currently met due to the deficit in units, and the loss of individual trees on site.

4.3 The purchase of units from a private habitat provider, such as the Environment Bank, shall be sought post-planning approval to allow the shortfall in units to be addressed. Purchased units shall include a minimum of 0.15 units of either individual trees or a higher distinctiveness habitat type and 0.15 units of any low distinctiveness (or higher) habitat type to ensure that all trading rules are met. This approach is in accordance with Government guidelines, with the completion of a full metric with inclusion of off-site habitats provided pre-commencement as part of the standard Biodiversity Gain Condition.

I dispute that the current proposal meets the mandatory minimum 10% net gain in hedgerow units - see my comments above about the manipulation of the data. I could create an improvement by first making a deficit to then be able to improve it!

The report highlights that there will be a negative gain to the local environment and suggest the effect of this can be "bought" away with the purchase of units from a private habitat provider, such as the Environment Bank as part of the standard Biodiversity Gain Condition.

Purchasing units from a private habitat provider to make up the deficit is of no benefit to those living with the impact of this development. We currently have a small nature reserve right in our midst and you wish to develop over this green lung in an already overbuilt area but to compensate you are willing to plant a tree somewhere else! I would also be very sceptical of these green washing schemes which mostly turn out to be about money and not environment.

If there are any proposed Bio-diversity improvements accepted (and these are always suggested as being completed AFTER the development) these will be impossible to enforce once planning has been approved and the development completed.

Kind regards