

# Comments summary

Dear Sir/Madam,

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

Comments were submitted at 12/01/2026 4:24 PM from [REDACTED]

## Application Summary

|               |                                                                                 |
|---------------|---------------------------------------------------------------------------------|
| Address:      | Millers Farm Gravesend Road Fairseat Sevenoaks Kent                             |
| Proposal:     | Extension of existing traveller site to provide 6 additional mobile home units. |
| Case Officer: | Ms Amanda Cue                                                                   |

[Click for further information](#)

## Customer Details

|          |                   |
|----------|-------------------|
| Name:    | [REDACTED]        |
| Email:   | [REDACTED]        |
| Address: | Wrotham Sevenoaks |

## Comments Details

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

Reasons for comment:

|           |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         |
|-----------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Comments: | <p>1. Inappropriate Development in the Green Belt</p> <p>The application site lies within the Metropolitan Green Belt. The proposed increase from 3 to 9 static caravans represents a significant intensification of development and constitutes inappropriate development within the Green Belt.</p> <p>Paragraphs 152-154 of the National Planning Policy Framework (NPPF) make clear that inappropriate development is, by definition, harmful to the Green Belt and should not be approved except in very special circumstances. The proposal would materially harm the openness of the Green Belt through increased built form, activity, vehicle movements, lighting, and domestic paraphernalia.</p> <p>The proposal conflicts with Gravesham Borough Council Local Plan policies relating to Green Belt protection, including Policy CS02, which seeks to safeguard openness and restrict inappropriate development. No very special circumstances have been demonstrated which clearly outweigh the harm identified.</p> <hr/> |
|           | <p>2. Overdevelopment and Excessive Intensification of Use</p> <p>The tripling of static caravans from 3 to 9 represents overdevelopment of the site. The scale and intensity of use would be wholly out of keeping with the rural character of the area and would introduce an unacceptable level of activity into a</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                               |

sensitive Green Belt location.

Paragraph 135 of the NPPF requires development to be sympathetic to local character and establish a strong sense of place. The proposal fails this test and conflicts with Gravesham Local Plan policies seeking to ensure development respects local character and context.

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### 3. Harm to Residential Amenity - Noise and Disturbance

The existing authorised use of the site already results in significant noise and disturbance which adversely affect neighbouring residential amenity.

I work from a log cabin located directly on the boundary with the application site. As such, I am particularly affected by daytime noise and activity. Increasing the number of static caravans to 9 would inevitably lead to a material increase in noise, vehicle movements, visitors, and general activity throughout the day and evening.

This would result in unacceptable harm to residential amenity, contrary to paragraph 135(f) of the NPPF and relevant Gravesham Local Plan policies which seek to protect the living conditions of existing residents.

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### 4. Loss of Privacy and Overlooking

The proposed static caravans would be positioned approximately 30 metres from my boundary. The land is higher than my house. Their location would result in direct overlooking of my living room and sun balcony where I rest and exercise, my garden, and boundary-located work cabin, causing a significant loss of privacy.

This level of overlooking would be unacceptable and contrary to established planning principles and Gravesham Local Plan policies designed to safeguard residential privacy and amenity.

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### 5. Highway Safety and Increased Traffic Generation

The proposed expansion would result in a significant increase in vehicle movements associated with residents, visitors, deliveries, and service vehicles.

The site access joins a fast-moving road on a slight bend, where visibility is already restricted. Vehicles turning in and out of the site are required to slow or stop in traffic, creating a hazardous situation due to reduced sightlines and the speed of approaching vehicles.

Paragraph 115 of the NPPF states that development should only be prevented on highway grounds where there would be an unacceptable impact on highway safety. In this instance, the increased frequency of turning movements would materially increase risk to all road users. The proposal also conflicts with Gravesham Local Plan transport and highway safety policies, including Policy CS12.

No robust highway or transport assessment has been submitted to demonstrate that the access or surrounding road network can safely accommodate the increased traffic.

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## 6. Ecological Impact - Protected Species (Bats)

Bats are present in trees on and adjacent to my property, close to the application site. Bats are a European Protected Species under the Conservation of Habitats and Species Regulations 2017.

Paragraphs 180 and 186 of the NPPF require that development should avoid harm to biodiversity and that permission should be refused where significant harm to protected species cannot be avoided, mitigated, or compensated.

The increased intensity of use, combined with additional lighting (including currently unauthorised bright external lighting), noise, and activity, is likely to adversely affect bat foraging and habitat. It is unclear whether adequate ecological surveys or mitigation measures have been undertaken. In the absence of robust ecological evidence, the proposal should not be supported.

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## 7. Failure to Demonstrate Traveller Need or Deliverability

The applicant's agent asserts that the additional caravans would be occupied by grandchildren of the existing family and that the proposal would contribute towards meeting the Council's identified need for traveller accommodation.

However, no clear or verifiable evidence has been submitted to demonstrate:

- that there is a genuine and immediate need for all additional units proposed, or
- that the stated individuals would occupy the site on a long-term basis.

There is no proposed mechanism to control future occupancy. Planning decisions must be based on demonstrable need and certainty of delivery, not speculative future circumstances. The proposal therefore fails to justify its scale or necessity and conflicts with Gravesham Local Plan Policy CS19 relating to Gypsy and Traveller sites.

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## 8. Planning History, Breaches of Condition and Enforceability

The site has a history of non-compliance with planning conditions, followed by retrospective applications rather than compliance with approved permissions.

There are currently at least two breaches of planning control, including:

- the siting of an unauthorised fourth static caravan, and
- the installation of bright external lighting, which is harmful to residential amenity and local ecology.

Paragraph 59 of the NPPF confirms that effective enforcement is essential to maintain public confidence in the planning system. Given the repeated breaches and disregard for existing controls, there is serious concern that any further permissions would not be adhered to, rendering conditions ineffective and unenforceable.

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## 9. Artificial Creation of Need Through Unauthorised Development

The proposal seeks to justify further development based on circumstances that have arisen, at least in part, through unauthorised development and failure to

comply with existing planning permissions.

Planning policy is clear that harm arising from unauthorised development should not be used to justify additional development. Granting permission in these circumstances would undermine the integrity of the planning system and set an undesirable precedent.

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#### 10. Availability of Alternative Sites and Lack of Necessity

The applicant is known to control another traveller site within the borough which is significantly larger in scale and does not have the same level of close residential neighbours. This raises further questions as to whether the intensification of this constrained Green Belt site is necessary.

Where alternative land under the applicant's control exists that could accommodate additional units with substantially less harm to Green Belt openness, residential amenity, highway safety, and ecology, the case for very special circumstances is significantly weakened.

The application provides no assessment of alternative sites or explanation as to why further development must occur at this sensitive location rather than land already under the applicant's control which would result in demonstrably less harm.

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#### Conclusion

The proposal would result in inappropriate development in the Green Belt, overdevelopment of the site, unacceptable harm to residential amenity, highway safety risks, ecological harm, and serious concerns regarding enforceability due to a clear history of planning breaches.

The claimed justification relating to traveller need is unsupported by evidence and fails to outweigh the substantial and multiple harms identified. The proposal conflicts with the NPPF and Gravesham Borough Council Local Plan policies, including Policies CS02, CS12 and CS19.

For these reasons, I respectfully request that this application be refused.

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#### Short Summary (for Councillors)

- Inappropriate Green Belt development with no very special circumstances
  - Tripling of caravans constitutes overdevelopment
  - Severe harm to residential amenity (noise, privacy, working from boundary cabin)
  - Unsafe access onto fast road with reduced visibility
  - Likely harm to protected bat species
  - Traveller need not evidenced or enforceable
  - Repeated breaches of planning conditions undermine confidence
  - Alternative site under applicant's control exists with less harm
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Kind regards