

# Comments summary

Dear Sir/Madam,

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

Comments were submitted at 02/12/2025 11:52 AM from [REDACTED]

## Application Summary

Address:	Land Adjacent To Longfield Road Meopham Gravesend Kent DA13 0EW
Proposal:	Outline application for the erection of up to 120 residential dwellings, public open space and associated works. Approval is sought for the principal means of vehicular access from Longfield Road and all other matters are reserved.
Case Officer:	Mrs Alison Webster

[Click for further information](#)

## Customer Details

Name:	[REDACTED]
Email:	[REDACTED]
Address:	[REDACTED]

## Comments Details

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

Reasons for comment:

Comments:

The following points draw on UK planning law, the National Planning Policy Framework (NPPF), and standard local-authority obligations. They are written in a format suitable for an objection or legal representation.

1. Failure to Demonstrate Safe and Suitable Access for All Users (NPPF §110-112)

Under the NPPF, development must not be approved if it fails to provide:

"safe and suitable access to the site for all users" (NPPF §110b), and

must ensure that development "minimises conflicts between pedestrians, cyclists and vehicles" (NPPF §112).

Risk to Children at Meopham School & Helen Allison SEN School

The proposed development is in very close proximity to:

Meopham School (secondary school), and

Helen Allison School, which caters specifically for children with autism and complex special educational needs.

Both sites generate predictable, heavy, vulnerable pedestrian flows at very specific times of day (school start/finish). Any increase in vehicle movements from a new residential development-construction vehicles first, then long-term traffic-introduces:

Additional crossing risks

Increased congestion at known pinch points

More vehicle-pedestrian conflict in an area already under pressure during peak school times

For children with autism, sensory-processing difficulties, or limited road-awareness, the increased noise, unpredictability, and traffic volume present disproportionately high danger. If risks to vulnerable road users cannot be mitigated, the council cannot lawfully conclude that access is "safe and suitable".

## 2. Unacceptable Highway Safety Impact (NPPF §111)

The NPPF is clear:

"Development should only be prevented or refused on highways grounds if there would be an unacceptable impact on highway safety..."

Where the local road network is already heavily used for school traffic-and especially where a SEN school is involved-the threshold for "unacceptable impact" is significantly lower.

Key issues include:

Narrow village roads not designed for higher traffic intensity

Inadequate footways or crossing facilities for SEN students

School buses, taxis, and parent vehicles already creating congestion at peak times

Increased risk of accidents involving children with impaired danger awareness

If expert evidence shows any material worsening of safety risk, the council is legally justified-indeed obliged-to refuse the application.

## 3. Increased Construction Traffic Poses Direct and Disproportionate Risk to SEN Pupils

During construction, HGVs, delivery vehicles, and site traffic present a heightened and immediate hazard.

For pupils attending the Helen Allison School:

Sudden loud noises, engine braking, and unpredictable movements can trigger sensory overload or panic responses

A child may flee, wander, or become disoriented-dramatically increasing road-safety risk

Additional traffic can obstruct school transport vehicles that require clear, predictable access

The developer must prove that construction logistics do not endanger vulnerable children. If they cannot, the council cannot lawfully grant permission.

#### 4. Non-Compliance with the Equality Act 2010 - Public Sector Equality Duty (PSED)

Gravesham Borough Council, as a public authority, has a legal obligation under s.149 Equality Act 2010 to:

Give due regard to the need to eliminate discrimination, and

Protect groups with protected characteristics, including disability.

Children at Helen Allison School have disabilities falling under the Act. If a development creates a foreseeable increased danger to disabled children near the site, the council must consider this directly in decision-making.

If the council grants permission without properly assessing:

Safety impacts on SEN pupils

Increased risk of harm during daily travel

Disproportionate impact relative to non-disabled pupils

the decision may be legally challengeable via judicial review for failure to comply with the PSED.

#### 5. Potential Conflict with Local Plan Policies

Although specifics depend on the exact Gravesham Local Plan policies, typical relevant policies include:

Protection of community facilities, especially schools

Ensuring developments do not cause harm to health, safety, or local amenity

Preservation of village character and avoidance of overdevelopment

Traffic and transport impact policies requiring safe pedestrian environments

If the proposal conflicts with any of these, the council is entitled to refuse permission.

#### Conclusion: Why the Planning Application Should Not Proceed

Based on UK planning law, the NPPF, and statutory equality duties, the proposed development near Meopham School and Helen Allison SEN School should not proceed because:

It fails to demonstrate safe and suitable access, especially for vulnerable children.

It would likely have an unacceptable impact on highway safety, contrary to NPPF §111.

Construction and long-term traffic would introduce serious, foreseeable risks to pupils, especially those with autism