

Formal Objection to Planning Application 20250889
Outline Planning Application, Buckland Farm, Chalk Road, Higham

[REDACTED]
Chalk Road
Lower Higham
Rochester
Kent
ME3 7JY

Mrs Alison Webster
Planning Case Officer
Gravesham Borough Council
Civic Centre
Windmill Street
Gravesend
DA12 1AU

Dear Mrs Webster,

Application Reference 20250889
Outline Planning Application, Buckland Farm, Chalk Road, Higham

1. Introduction and Interest

We are residents of Chalk Road, Lower Higham, and our property, [REDACTED] sits directly opposite the proposed development site at Buckland Farm, Chalk Road, Higham. We are therefore directly and materially affected by planning application 20250889.

We object to this application and do not consider that the proposed development should go ahead. While we recognise that Gravesham faces housing pressures, those pressures do not justify approving a scheme where the evidence shows serious and unresolved healthcare, highway, drainage, ecological, Green Belt, construction impact and deliverability concerns.

We moved to [REDACTED] because of the rural setting, open outlook, landscape character, quieter way of life and proximity to the natural environment. These qualities are central to the character of this part of Lower Higham. The proposed development would have the opposite effect by introducing a substantial residential scheme, a new access, additional traffic, construction activity, lighting, noise and long-term urbanising effects directly opposite our property. While personal preference alone is not the basis of this objection, the impact on local character, residential amenity and the rural edge of the village is a genuine planning concern.

Our objection is not simply based on private amenity. The applicant's own documents and consultee responses show that this site remains subject to serious infrastructure, environmental and deliverability constraints. In our view, the application is not acceptable in planning terms and should be refused.

2. Primary Healthcare

Higham no longer has a functioning GP surgery. The former Highparks Medical Practice branch at Hermitage Road, Higham, which was the only local primary care facility serving the village, is now closed. Residents are now expected to travel to other surgeries, including Cliffe Woods, Cliffe or Wainscott. These are not conveniently accessible from Lower Higham by reliable public transport, particularly for elderly residents, disabled residents, residents without cars and housebound patients.

This is not a speculative concern. NHS Kent and Medway Integrated Care Board has confirmed, in relation to application 20250889, that the proposed 40 dwellings would increase demand on primary and community healthcare services. The ICB estimates a population increase of approximately 91 people and has requested a healthcare contribution of £50,815.80 towards healthcare capacity within a three-mile radius.

The key point is not simply that a financial contribution has been requested. The ICB also states that it is not possible at this time to identify a specific premises project. That means the healthcare impact is acknowledged, but the practical mitigation is not clearly identified, secured or deliverable.

Approving 40 additional dwellings in a village whose only GP surgery has now closed would worsen an existing infrastructure deficit. A generic contribution with no identified premises project does not resolve the immediate problem that future and existing residents would need to travel further for basic healthcare. This would also increase vehicle trips and place additional pressure on Chalk Road and the surrounding rural road network.

There is also a potential compounding impact on local pharmacy provision. If reduced GP footfall affects the viability of the village pharmacy, Higham could be left without both local GP provision and associated prescription services. For these reasons, the application should not be approved.

3. Highways, Access and Sustainable Transport

Chalk Road is a narrow rural road with limited width, on-street parking pressure and restricted visibility in places, particularly near Taylors Lane and the proposed site access.

The relationship between the proposed access and Taylors Lane is a serious highway concern. Taylors Lane is a narrow single-lane country road directly opposite or immediately adjacent to the proposed access area. Vehicles already use Taylors Lane and Chalk Road in a constrained rural highway environment. Introducing a new residential access for up to 40 dwellings, together with construction traffic and HGV movements, would increase the risk of conflict between vehicles emerging from Taylors Lane, vehicles travelling along Chalk Road, and vehicles entering or exiting the development site. This is not a standard access arrangement. In our view, this relationship is unsafe and the application should be refused on highway safety grounds.

As residents of [REDACTED] for approximately 18 months, we have daily direct experience of traffic conditions on Chalk Road. The section of road outside our property is subject to frequent dangerous and excessive speeding. Vehicles travelling westbound often use the transition from the 30mph area towards the 50mph section as an opportunity to accelerate sharply. Conversely, vehicles travelling eastbound from the 50mph section frequently fail to reduce their speed to the legal 30mph limit and continue at excessive speed along Chalk Road past residential properties. In our experience, this is not an occasional issue. It is something we observe on a daily basis, and other residents along this section of Chalk Road would, we believe, be able to attest to the same pattern of dangerous and excessive speeding.

Last year alone there was a road traffic incident directly outside our property in which a vehicle travelling eastbound struck parked vehicles. This illustrates the existing safety risk on this section of Chalk Road before any additional construction traffic, HGV movements or residential traffic from the proposed development is introduced.

The proposed access is a single priority junction from Chalk Road. The applicant's own plans show that the access would be positioned directly opposite or immediately in front of [REDACTED]. This means that construction vehicles, HGVs, deliveries and all future vehicle movements associated with up to 40 dwellings would enter and exit the site directly opposite our home.

KCC Highways' consultation response confirms that no facilities are located within 1km of the site and that most local facilities are approximately 1.8km away, around a 20-minute walk. It also notes that the local bus service is limited, with only three services per day Monday to Saturday, no Sunday service, no AM peak service and only one PM peak service. The medical practice previously identified within walking distance is now closed. KCC Highways also identifies the need to consider transport policy objectives around reducing car dependency and increasing active travel and public transport.

That evidence supports an objection to this application. Planning and transport policy seek to reduce reliance on private vehicle use and encourage walking, cycling and public transport. This development would do the opposite. The facilities within or near Higham are limited and do not amount to the full range of day-to-day services needed to support a development of this scale. A newsagent, post office and pharmacy are useful local services, but they are not a substitute for a GP surgery, supermarket, wider retail provision, employment opportunities, secondary schools or other essential services. Future residents would therefore still need to travel outside the immediate area for many routine needs, including healthcare, larger food shops, education, employment and other services.

The closure of the local GP surgery makes this worse. Residents who previously may have accessed healthcare within Higham would now need to travel to medical facilities further away. For elderly residents, disabled residents, families with young children and those without reliable access to public transport, this is not a minor issue. It would increase car dependency and add further traffic pressure to Chalk Road, Taylors Lane and the surrounding rural road network.

KCC Highways also notes that the proposed access is opposite existing driveways and is "not ideal". The Road Safety Audit identified concerns around large vehicles using both sides of the access and part of the main carriageway when turning in and out of the site. Speed survey data also showed traffic already exceeding the 30mph speed limit, with 85th percentile speeds of 33mph eastbound and 38mph westbound.

The applicant's own speed data supports our lived experience that vehicles already exceed the legal speed limit on this section of Chalk Road. Introducing a new access directly opposite [REDACTED] together with construction traffic, HGVs and future residential traffic from up to 40 dwellings, would materially increase an existing highway safety risk.

Taken together, the proposed development would add further vehicle movements to a road where there are already serious and well-evidenced concerns: excessive speeding, constrained access, limited visibility, residential frontage, the tight single-lane character of Taylors Lane, and poor access to day-to-day services. The limited public transport provision, the closure of the local GP surgery, and the absence of a full range of everyday facilities mean future residents are likely to rely heavily on private cars. This would increase traffic pressure on Chalk Road and the surrounding rural road network, directly conflicting with the objective of reducing reliance on private vehicles. For these reasons, the application should be refused.

4. Flood Risk, Drainage and Surface Water Outfall

Flood risk and drainage are among the strongest technical reasons why this application should not be approved.

The applicant's documents confirm that the site is near Flood Zones 2 and 3 and that the northern part of the site is constrained by flood risk. The Environment Agency did not object to the principle of the access, on the basis that housing would be outside Flood Zones 2 and 3 and outside Thames Tidal Breach, but it still reminded the Council of the need to consider the sequential and exception tests.

More importantly, KCC as Lead Local Flood Authority maintained a holding objection in February 2026 because the proposed surface water outfall had not been demonstrated to be deliverable. The LLFA stated that the operational condition of the downstream culvert had not been demonstrated and that reliance on Network Rail's riparian responsibilities does not prove that the culvert can serve the development now or in the future. It also stated that, without formal confirmation from Network Rail and the Environment Agency and legal agreements securing access and maintenance, the LLFA could not consider the proposed outfall deliverable.

The North Kent Marshes Internal Drainage Board also raised concerns regarding the proposed drainage route, including defects in existing pipework, root ingress causing substantial loss of pipe capacity, structural defects and uncertainty around the downstream condition and maintenance position.

This means the drainage strategy depends on infrastructure whose condition, capacity, control, legal access and long-term maintenance are not resolved. That is not a minor technical matter. It goes directly

to whether the development can be safely and reliably delivered. A residential development of up to 40 dwellings should not be approved where the proposed surface water outfall remains subject to unresolved third-party confirmations, legal agreements and downstream infrastructure concerns.

5. Ecology, Protected Species and International Designations

The ecological position is not straightforward and supports refusal of the application.

The site is approximately 15 metres from the Thames Estuary and Marshes Ramsar site and South Thames Estuary and Marshes SSSI. It also falls within the zone of influence of the Thames Estuary and Marshes SPA/Ramsar site. KCC Ecology confirms that an Appropriate Assessment is required as part of the Habitats Regulations Assessment process.

Natural England's response should not be treated as environmental clearance. Natural England expressly stated that it was not able to provide specific advice and had not been able to assess the potential impacts of the proposal on statutory nature conservation sites or protected landscapes. It also stated that non-detailed advice does not imply that there are no environmental impacts.

KCC Ecology also confirmed that a single common pipistrelle bat was found roosting in Building 1 and that a Natural England bat mitigation licence will be required before Building 1 can be removed. This means demolition is not unconstrained. Delivery depends on protected species licensing, updated survey work and mitigation. That is a material planning and deliverability issue.

The applicant's Ecological Impact Assessment confirms that the development would result in the loss of modified grassland, individual trees and urban habitats. The claimed Biodiversity Net Gain is therefore dependent on future habitat creation, enhancement, management and monitoring. It does not mean there is no ecological harm. It means the proposal relies on future mitigation to compensate for that harm.

We have also observed and photographed a slow worm in our garden at Avonlea, directly opposite or within the immediate vicinity of the proposed development site. This is a site-proximate record of a protected reptile species within the immediate local habitat network. Given the presence of paddock land, hedgerows, unmanaged margins, boundary vegetation, rubble, structures and garden habitat, this reinforces the concern that the proposal affects a wider ecological network rather than an isolated redundant brownfield plot.

The application depends on Appropriate Assessment, Natural England licensing, ecological conditions, long-term BNG management and species mitigation. These dependencies show that the development is environmentally constrained and should not be approved.

6. Brownfield Classification, Green Belt and Paddock Land

The site is repeatedly presented as brownfield or previously developed land. We object to that characterisation insofar as it implies that the whole site is previously developed or of limited rural value.

The applicant's own Planning Statement confirms that the site is in mixed use, with existing buildings used for commercial and domestic purposes and surrounding land used for temporary storage and animal grazing. The applicant's Heritage Statement also refers to paddock land within the site.

The existing commercial use is also relevant because parts of the site currently provide space for businesses or occupiers who rent and use the existing units. The proposal would remove that commercial and employment floorspace and displace those existing uses. That economic impact should not be ignored or treated as irrelevant simply because the site is being promoted for housing. It further demonstrates that the site is not simply vacant or redundant brownfield land, but an active mixed-use site with existing commercial, rural and paddock functions.

The presence of livestock also reinforces that parts of the site are in active paddock or grazing use, rather than being simply redundant brownfield land. If any animals remain on or adjacent to the site during clearance, enabling works or construction, their welfare would need to be properly considered.

However, our main point is that the current use of the land is relevant to the correct classification of the site and to whether the brownfield justification has been overstated.

The applicant's Landscape and Visual Appraisal does not identify the site as being within an Area of Outstanding Natural Beauty or National Landscape. We are not arguing that it is. Our point is that the site forms part of the Green Belt and rural edge of Lower Higham, outside the adopted settlement boundary, and the proposal would introduce urbanising development into a locally valued countryside setting.

The NPPF definition of previously developed land does not automatically include paddock or grazing land simply because that land is near commercial buildings or hardstanding. Actively used paddock or grazing land should not be swept into a brownfield classification without proper analysis.

If a meaningful proportion of the site is not previously developed land, the justification for treating the proposal as a brownfield or grey belt opportunity is weakened. In our view, the application relies too heavily on an oversimplified brownfield narrative and should be refused.

7. Construction Impacts on Existing Residents

The construction impact on existing residents, including our property, is a further reason why the application should not be approved.

The applicant's Statement of Community Engagement describes the existing buildings as being of significant scale, with a total volume of approximately 3,835 cubic metres and heights ranging from around 9.5 metres to 13.5 metres. Demolition of structures of this size, followed by groundworks, drainage installation, foundations, highway works and housing construction, would create significant dust, noise, vibration and traffic impacts.

The proximity to [REDACTED] is particularly important. Our property sits directly opposite the proposed access and would be exposed to site traffic, HGV movements, deliveries, turning activity, noise, dust and vibration throughout the construction period.

Of particular concern is dust from demolition, concrete work and excavation, including respirable crystalline silica dust and chalk dust from groundworks. These are foreseeable construction impacts arising at close range to existing homes.

The scale and proximity of the demolition and construction activity would create unacceptable amenity impacts for existing residents, especially for our property directly opposite the proposed access. These impacts should not be treated as manageable background inconvenience. They are central to why this application is inappropriate in this location.

8. Heritage, Archaeology and Local Character

The site is close to the Lower Higham Conservation Area and forms part of the rural edge of Lower Higham. A development of up to 40 dwellings would materially change the character and appearance of this part of Chalk Road.

KCC Heritage Conservation has confirmed that the site lies in an area of multi-period archaeological potential. The response refers to Roman activity in the wider Higham area, cropmarks nearby and a curvilinear feature identified through geophysical survey which may be archaeological in nature. KCC recommends archaeological field evaluation and, if necessary, safeguarding or further investigation.

The significance of this point is that the site is not unconstrained. The proposal would urbanise a rural edge location and is also subject to archaeological uncertainty. That weighs against approval, particularly when combined with the healthcare, highways, drainage and ecological concerns set out above.

9. Education and Wider Infrastructure

The proposed development would place pressure on wider infrastructure.

KCC's developer contribution assessment identifies a need for secondary education and SEND contributions. It estimates that the development would generate eight secondary pupils and one SEND pupil, with contributions sought towards secondary school build and special educational needs provision.

This is not, by itself, the strongest reason for refusal. However, it supports the broader point that the scheme is not infrastructure-neutral. The development would generate additional demand across education, SEND, healthcare, waste, roads and community infrastructure. That matters because the acceptability of the application depends on whether this infrastructure can be practically and fairly delivered, not simply whether financial contributions can be listed.

Higham Parish Council has also raised concerns regarding local amenities, school capacity, traffic, drainage, Green Belt, rural character and proximity to protected environmental designations. These are not isolated concerns raised by one resident. They reflect wider local infrastructure and environmental issues.

10. Planning History and Deliverability

The Council's housing land supply material refers to application reference 2020/00044/REF at Equipets Cleaning Services Ltd, Unit D, Buckland Farm, Chalk Road, Higham, ME3 7JY. If this reference relates to a previous refusal or appeal decision, the reasons for that decision should be considered carefully, particularly where they identify site-specific constraints relating to access, Green Belt, character, drainage, amenity or deliverability.

The key point is that this site should not be treated as straightforwardly deliverable where relevant planning history may identify unresolved or recurring constraints. On the evidence currently available, the proposal remains subject to serious concerns relating to highway safety, drainage, ecology, infrastructure, rural character and residential amenity.

For those reasons, any previous refusal history or appeal findings should weigh against approval unless the Council is satisfied that the relevant site-specific constraints have genuinely been overcome. In our view, the current application does not demonstrate that they have been overcome.

11. Overall Planning Balance

We recognise that Gravesham is under pressure to identify and deliver housing land. However, housing pressure does not mean that every proposed development is sustainable or acceptable.

Planning should deliver sustainable development, including social, environmental and economic dimensions. This application would place additional housing in a village that has lost its only GP surgery, would increase car dependency, would add vehicle movements to a road with daily speeding and an unsafe access relationship, would rely on unresolved drainage infrastructure, and would affect an ecologically sensitive location close to internationally and nationally designated sites.

The applicant's own documents and consultee responses show that the scheme is dependent on healthcare mitigation with no specific premises project currently identified, unresolved drainage and outfall arrangements, legal agreements and third-party confirmations, a bat mitigation licence from Natural England, Appropriate Assessment under the Habitats Regulations, long-term BNG management and monitoring, highway works, archaeological evaluation and construction controls to protect nearby residents.

These are not minor details. They go to whether the development is acceptable, safe, sustainable and deliverable. In our view, the cumulative weight of these concerns means the application should be refused.

12. Summary of Objection

We object to planning application 20250889 for the following reasons:

- Higham's only GP surgery has closed and healthcare mitigation is not tied to an identified premises project.
- The site is likely to increase car dependency because the nearby facilities are limited and do not provide the full range of shops, healthcare, schools, employment and other services needed for day-to-day living without private vehicles.
- The proposed access is directly opposite our property and has an unsafe relationship with Chalk Road and Taylors Lane.
- Daily speeding and a recent collision outside our property show that this section of Chalk Road already has a material highway safety problem.
- The LLFA maintained a holding objection because the proposed surface water outfall had not been demonstrated to be deliverable.
- The site is ecologically constrained by proximity to designated habitats, bat licensing requirements, BNG dependencies and local reptile evidence.
- The brownfield case is overstated because parts of the site are active paddock or grazing land.
- The proposal would remove existing commercial and employment space and displace current occupiers, further undermining the claim that the site is simply redundant brownfield land.
- The proposal would introduce urbanising development into the Green Belt and rural edge of Lower Higham.
- Demolition and construction would have unacceptable impacts on neighbouring residents, especially Avonlea directly opposite the proposed access.
- The cumulative infrastructure, environmental, highway and amenity impacts make the proposal unacceptable.

Conclusion

For the reasons set out above, we respectfully request that Gravesham Borough Council refuses planning application 20250889.

We also ask that this objection letter is uploaded to the application file and taken into account in full when the application is determined.

Yours faithfully,

Chalk Road
Lower Higham
Rochester
Kent
ME3 7JY

Source documents considered

- NHS Kent and Medway ICB consultation response for application 20250889.
- KCC Highways and Transportation consultation response dated 21 October 2025.
- KCC Lead Local Flood Authority response dated 12 February 2026.
- North Kent Marshes Internal Drainage Board response dated 8 January 2026.
- KCC Ecological Advice Service responses for application 20250889.
- Natural England consultation response for application 20250889.
- Applicant Planning Statement, Statement of Community Engagement, Landscape and Visual Appraisal, Ecological Impact Assessment and Heritage Statement.
- KCC Heritage Conservation response dated 10 October 2025.
- KCC developer contributions material and Higham Parish Council consultation response.