

Comments summary

Dear Sir/Madam,

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

Comments were submitted at 25/09/2025 1:59 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] Meopham

Comments Details

Commenter Type:	Neighbour
Stance:	Customer objects to the Planning Application
Reasons for comment:	
Comments:	I write as a local resident / stakeholder to object strongly to the proposal to build 100 houses on Blackthorn Farm. I believe the development is contrary to national and local planning policy, will cause unacceptable environmental, traffic and infrastructural harm, and damage the character and amenity of the area. Below are in detail my grounds for objection.

1. Conflict with the National Planning Policy Framework (NPPF)
1. Highways safety and traffic impacts (Paragraph 116 of the NPPF)
 - The NPPF requires that developments should only be refused on highways grounds if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the road network would be severe, after mitigation.
 - The development proposes access off the A227, a busy main artery. The proposal anticipates a substantial increase in traffic (200+ additional vehicle movements), particularly at peak times, exacerbating existing congestion. The risk of accidents is increased where visibility or turning is difficult.
 - No reliable evidence has been provided that the A227 has capacity now, or will have after mitigation, to safely accommodate the additional traffic, particularly of large or emergency vehicles, without creating severe residual impacts.
2. Protection of ancient woodland, habitat and biodiversity (Paragraph 180, ancient woodland guidance etc.)
 - Ancient woodland, veteran or ancient trees are irreplaceable habitats. Under NPPF paragraph 180(c) (and related guidance), proposals which result in the loss or deterioration of ancient woodland, ancient trees or veteran trees should be refused unless there are wholly exceptional reasons, and a suitable compensation strategy is in place. Compensation does not justify harm in the first instance.
 - The proposal adjoins ancient woodland owned by the View School. Concern has been raised that there is misrepresentation of land ownership, but regardless, the woodland is likely to suffer from run-off, pollution, light intrusion,

disturbance, which will degrade its condition even if not destroyed.

- The ecological survey has to robustly show the presence or absence of protected species (bats, nesting birds etc.) and how they will be impacted, mitigated, or avoided. Mere claims are not sufficient without credible independent ecological evidence.

3. Green Belt / Grey Belt provisions, and protection of undeveloped land

- The site is undeveloped (i.e. not previously developed (brownfield) land), set in a rural setting, contributing to the openness of the countryside. The proposal therefore appears contrary to policy protections for Green Belt / undeveloped land unless exceptional circumstances are proven.

- The revised NPPF (December 2024) introduces the concept of grey belt land (Green Belt land that does not strongly contribute to specific Green Belt purposes). However, even if this land were to be considered grey belt, developers must still satisfy tests including that the development would not fundamentally undermine the purposes of the Green Belt across the planning area as a whole; be in a sustainable location; meet the "Golden Rules" for major development on land released from or in the Green Belt.

- From what is known, it seems the site may well contribute to Green Belt purposes (preventing merging of settlements, protecting openness, preserving rural character etc.). Without convincing evidence that it does not, the site cannot simply be reclassified or treated as suitable for major housing development under grey belt policy.

4. Golden Rules under NPPF for major development in Green Belt / land released from Green Belt

- The NPPF requires that when major housing development is proposed on land released from Green Belt (or on sites in Green Belt subject to application), the scheme should satisfy a number of criteria (the "Golden Rules"):

a. Affordable housing in accordance with local need or policy.

b. Necessary improvements to local or national infrastructure.

c. New, or improvements to existing, green space accessible to the public.

- There is no clarity in the application how these will be met: how many of the 100 houses would be genuinely affordable; what infrastructure improvements would accompany the development (roads, services, schools, health, etc.); how green/open space would be preserved or created; how public transport or walking/cycling links would be provided.

5. Other relevant NPPF paragraphs

- Pollution, living conditions, natural environment (e.g. light pollution, air quality) must be considered. Developments must avoid unacceptable harm to residents' living conditions and natural environment.

- Paragraphs relating to flood risk, surface water run-off etc must be satisfied.

Given slope and chalk substrate, there is higher risk of surface water / groundwater interaction; need robust flood risk assessment and drainage strategy.

2. Environmental Impacts

1. Wildlife and protected species

- Local reports indicate bats, numerous bird species, woodland-edge species are present. These are protected under UK law / European conventions; their habitat must be preserved, or if disturbed, only in accordance with strict mitigation/compensation.

- Light pollution, noise, human disturbance likely to degrade habitat. For bats in particular, boundary features, tree cover, foraging corridors must be preserved. Cutting into woodland edges or adjoining land proximate to woodland will cause loss of foraging habitat, disruption of flight paths.

2. Ancient Woodland

- As above, the ancient woodland is an irreplaceable asset. Even if the physical woodland is not cleared, adjoining development causes harm (ecological edge effects, shading, changes in hydrology, risk of invasive species, runoff, disturbance) that degrade its ecological and amenity value.

- Given that ancient woodland has legal and policy protection, unless there are wholly exceptional reasons, and unless harm is avoided, mitigated, or compensated, the development should be refused. Current proposals do not meet that test.

- Also the ownership / boundary issues raise concerns: misrepresentation of ownership muddying where protection duties lie. The school's woodland, if impacted, would be a significant loss, both ecologically and for community amenity.

3. Flood risk, drainage, slope and water runoff

- The site is on a steep slope (chalk substrate), which tends to channel water quickly. Currently the fields and woodland absorb rainfall; built development (roofs, roads, impermeable surfaces) will significantly increase run-off.
- Adjoining roads (A227) and residential streets (e.g. Rhododendron Avenue) already experience flooding events; this development risks worsening the situation.
- There is need for a detailed hydrological / flood risk assessment, including downstream effects, sustainable drainage systems, and demonstration that local sewerage or drainage infrastructure can cope.

4. Air quality

- Traffic increases, particularly on an already busy trunk route (A227), will worsen air pollution. Some residents are likely to suffer in health, especially those with respiratory issues.
- Also construction phase will generate dust, emissions; mitigation must be demonstrated.

5. Visual impact, character, and amenity

- The proposed development will intrude visually into the countryside, especially being adjacent to ancient woodland and open fields. The character of the area (rural, semi-rural) will be damaged; views from certain vantage points (e.g. from the school, from countryside paths) will be adversely affected.
- Loss of openness and tranquillity, especially at night, from increased lighting etc.

3. Infrastructure, Access, and Services

1. Access and highways

- Safe access onto the A227 is problematic. The A227 is fast, busy, often congested. Additional vehicles (100 homes → perhaps 200+ vehicle movements in/out) will increase turning manoeuvres, which can be dangerous.
- Public transport is either absent or very limited. Without reliable bus service or other transport links, a new housing development of this size is car-dependent; that worsens congestion, pollution.

2. Emergency services access

- The development must allow unfettered access for emergency vehicles. If roads are narrow, steep, or if visibility is poor, or entrance points are constrained, there is risk to safety. Has this been properly surveyed?

3. Impact on schools, healthcare, community facilities

- New residents will demand additional capacity in local schools, health services, roads, drainage etc. If the development does not provide for it, either by investment or via planning obligations, they will put burden on existing services. The application does not appear to adequately demonstrate this.

4. Walking distances and sustainable access to facilities

- For development to be sustainable, residents must have reasonable walking or cycling access to shops, schools, public transport. If facilities are too far, or pedestrian infrastructure inadequate, then sustainability is compromised.

4. Policy, Local Plan & Green Belt / Rural Area Strategies

- Local Plan policies likely protect the openness, landscape, and rural setting. The proposal may conflict with local designations, landscape character areas, or other design policies.
- Development in a rural / countryside setting often requires that housing is sited sensitively, and that growth does not lead to sprawl or merging of neighbouring settlements or villages. This proposal risks the merging effect along the A227 / between villages.
- Local housing needs must be assessed: how many affordable homes are needed, and whether this development meets it. If only private housing, then local need is not met.

5. Lack of Demonstrated Exceptional Circumstances

- Given the protections for Green Belt / ancient woodland / rural character, if any of these are to be compromised, the proposal must demonstrate exceptional circumstances. So far, no compelling case has been made that:
 1. There is no alternative site(s) which are less harmful (e.g. brownfield, previously developed land).

2. That the housing need cannot be met elsewhere without harming these features.

3. That the public benefits of this development outweigh the harms.

- Usually Green Belt boundary changes or release of land (or building on undeveloped Green Belt land) are only allowed via the plan-making process, and with full assessments of impact, alternatives etc. This application appears premature or not justified in that context.

6. Cumulative Impacts

- It is not just this development: similar proposals or incremental development along the A227 / in rural fringes can together lead to serious cumulative harm: degradation of habitat, fragmentation of wildlife corridors, increased traffic, more pressure on infrastructure, merging of settlements, erosion of rural character.

- The "residual cumulative impact" test under NPPF (para 116) requires that cumulative effects be considered. Even if any one development seems manageable, together they may be severe.

7. Local Amenity, Health, and Quality of Life

- Increased traffic, pollution (noise, air, light), loss of countryside and views, increased flood risk, loss of wildlife all degrade quality of life for current residents.

- Noise / disturbance during construction, and longer term (traffic etc).

- The lack of communal green space or buffering will make the development feel cramped / intrusive.

8. Specific Technical or Factual Concerns / Gaps in the Application

- Ecological surveys: Does the applicant provide up-to-date, comprehensive surveys for bats, nesting birds, reptiles, amphibians? Are they seasonally valid? If not, refusal or condition required.

- Hydrology and drainage: More detail needed of sustainable drainage strategy, downstream effects, capacity of existing drainage infrastructure.

- Transport / Highways: Traffic modelling needs to include peak times, emergency vehicle access, effect of heavy or agricultural vehicles, visibility splays, turning lanes etc.

- Ownership and boundary issues: If ownership of the ancient woodland (e.g. the school's land) is misrepresented, that undermines confidence in their statements and could hide potential harmful impacts.

9. Summary of Public and Policy Benefit vs Harm

- What benefits are claimed? Housing is needed, possibly some affordable homes; some economic benefit from construction; some increase in rateable value / council tax.

- However, these benefits are far outweighed by the harm: risk to ancient woodland (irreplaceable); harm to biodiversity; risk of flooding; highway safety; detrimental change to character and amenity; likely inability of infrastructure and services to absorb demand; cumulative harms.

10. Conclusion & Suggested Recommendation

For all the above reasons, I respectfully request that the Planning Committee refuse permission for the development under reference 20250900. If for any reason the Council is minded to grant permission, I request that it only be done with significant modifications / conditions, including but not limited to:

- Reducing the number of units substantially, so that traffic / infrastructure / environmental impacts are manageable.

- Ensuring that any construction does not so closely abut the ancient woodland; buffer zones of at least 15 metres or more, with robust mitigation for runoff, light, noise etc.

- Requiring a comprehensive and binding ecological mitigation and compensation plan, demonstrating that any loss is avoided where possible.

- Ensuring a verified flood risk / sustainable drainage scheme is in place, with clear responsibility for maintenance.
- Guaranteeing a percentage of genuinely affordable housing (not just via "affordable market housing") in that development.
- Ensuring improvements to public transport, pedestrian and cycle links and safe access, both during construction and after.
- Secure community infrastructure contributions (roads, schools, health, green/open space) via Section 106 obligations.

Thank you for considering this objection. I trust that the Council will give full weight to the statutory and policy protections for ancient woodland, Green Belt / rural areas, and highway safety, and that in the absence of compelling justification that meets national policy tests, the application must be refused.

Kind regards