

# 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 12:00 PM from [REDACTED]

## Application Summary

Address:	Land West Of Norwood Lane Meopham Gravesend Kent DA13 0YE
Proposal:	Outline application with all matters reserved (except access) for a development of up to 150 dwellings (Use Class C3), including affordable dwellings, and associated landscaping, public open space and infrastructure works.
Case Officer:	Mrs Alison Webster

[Click for further information](#)

## Customer Details

Name:	[REDACTED]
Email:	[REDACTED]
Address:	[REDACTED] the russets Meopham

## Comments Details

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

Reasons for comment:

Comments:

This representation sets out the planning-law, policy and statutory grounds on which Gravesham Borough Council must refuse Planning Application 20251116. The proposal raises fundamental conflicts with Green Belt legislation, National Planning Policy Framework (NPPF) requirements, highway safety obligations, and local plan policy. The identified harms cannot be mitigated or conditioned away and therefore require refusal.

1. The Site Remains Designated Green Belt - Inappropriate Development (NPPF §§137-151)

The land subject to application 20251116 has not been released from the Green Belt boundary, and therefore retains full Green Belt protection.

Under the NPPF:

Construction of new buildings in the Green Belt is "inappropriate development."

Inappropriate development is harmful by definition unless Very Special Circumstances (VSC) are demonstrated.

General housing need does not constitute VSC (supported by multiple appeal decisions and case law such as Redhill Aerodrome Ltd v SSCLG).

The applicant has not demonstrated any identifiable Very Special Circumstances, nor have they proven that the development preserves openness-one of the two statutory Green Belt purposes. As the proposal introduces built form, hard surfacing, lighting, and vehicular access onto a rural lane, it results in:

Loss of Green Belt openness

Significant urbanising impact

Encroachment into vulnerable countryside

Where Green Belt policy is breached and no VSC exist, the council must refuse the application.

## 2. Failure to Provide Safe and Suitable Access (NPPF §110) - Norwood Lane Is Not Fit for Development Traffic

The developer proposes access via Norwood Lane, a narrow rural lane with:

Single-track width

No formal passing places

Poor visibility splays

No pedestrian footpaths

Soft verges regularly used to allow oncoming vehicles to pass

Agricultural and horse-riding traffic

Norwood Lane is physically incapable of accommodating construction vehicles, delivery lorries, refuse collection, emergency vehicles, or the increased daily traffic generated by new dwellings without creating severe conflict with other road users. Vehicles would frequently be forced onto verges, widening the carriageway informally and damaging the rural character.

The NPPF requires development to ensure:

Safe and suitable access for all users

Avoidance of conflict between pedestrians, cyclists, horses, agricultural vehicles and cars

A transport scheme that is appropriate to the site's context

Norwood Lane categorically cannot provide safe access. Because the constraint is geometrical and permanent, it cannot be mitigated through simple conditions or traffic management.

On this basis alone, refusal is required.

## 3. Unacceptable Highway Safety Impact (NPPF §111) - Mandatory Grounds for Refusal

Development must be refused where it would:

"...have an unacceptable impact on highway safety..."

The risks associated with this application are substantial:

Vehicles entering or exiting Norwood Lane must move onto the carriageway blind, due to restricted sightlines.

There is no width for two vehicles to pass safely.

Pedestrians must walk directly on the road, as there are no pavements.

Increased traffic would create a realistic and foreseeable risk of head-on collisions, verge collapses, and pedestrian injury.

The addition of construction traffic significantly amplifies these hazards. Since the NPPF requires refusal where an unacceptable impact exists, the council has minimal discretion.

#### 4. Danger to Children Walking to and From Meopham School

Meopham School generates large volumes of child pedestrian traffic at predictable times. Many pupils walk using routes that intersect or connect with Norwood Lane or the adjoining road network leading to it.

The combination of:

Narrow rural lanes

Increased construction and residential traffic

Absence of pavements

Children walking in groups

Vehicles attempting to negotiate tight passing spaces

creates a foreseeable and unavoidable danger. Children cannot be expected to safely share a single-track rural lane with construction lorries, refuse trucks, and increased residential traffic.

The council has a legal duty to protect vulnerable road users; exposure of children to such risks violates the NPPF and local plan safety policies.

#### 5. Conflict With Gravesham Local Plan Policies

The proposal appears to conflict with key policies including:

- Core Strategy Policy CS02 - Green Belt

Prevents inappropriate development in the Green Belt except in VSC.

- Policy CS11 - Transport

Requires development to be supported by safe access and adequate infrastructure.

- Policy CS19 - Development and Design Principles

Requires development to protect local character, landscape, safety, and amenity.

The proposal cannot comply with these policies because the physical constraints of Norwood Lane and the Green Belt designation cannot be altered or mitigated.

