

Comments summary

Dear Sir/Madam,

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

Comments were submitted at 14/09/2025 7:01 PM from [REDACTED]

Application Summary

Address:	Brookers Farm Luddesdown Road Luddesdown Gravesend Kent DA13 0XE
Proposal:	Retention/installation of 57 wine tanks and grape presses.
Case Officer:	Mrs Alison Webster

[Click for further information](#)

Customer Details

Name: [REDACTED]

Email: [REDACTED]

Address: [REDACTED]

Comments Details

Commenter Type:	Member of the Public
Stance:	Customer objects to the Planning Application

Reasons for comment:

Comments:

My objection is framed via the applicant's planning statement, using its section references:

2.3.3 The comment by a GBC Officer on a previous application that these tanks have no effect on local landscape character lacks the support of a Local Visual Impact assessment. See below (section 5.2.8).

3.1.5 The engineered escarpment cuts into the dry valley side of Cutter Ridge, resulting from the establishment of hard standing for the current tanks. So, the current situation was not the starting point, and some harm has already been caused to the local landscape character.

4.2.1 Gravesham Core Strategy
Policy CS01 - this application does not improve the social and environmental conditions of the area
Policy CS12 - this application does not conserve, restore or enhance landscape character: it positively detracts.

4.3.4 NPPF paragraph 154 (a) - this application, taken together with the other existing and planned development by this applicant, might constitute major development, which requires a different approach to planning beyond normal agriculture.

4.3.5 NPPF paragraph 187 - this application does not contribute to or enhance the natural, local environment.

4.36. NPPF paragraph 176 - this needs to be given great weight in GBC's decision, and clearly visible in the Officer's report.

Landscape Impacts

5.2.8 A major omission is visibility of the site from Henley Down, and several public footpaths there, a prominent landscape feature of the National Landscape, from which there are clear views of the site and its landscape context. This has a very significant visual impact that has not been considered.

5.2.10 The quotation used in this section that 'the AONB (National Landscape) Unit does not raise any objection to a permanent permission ...' is a misrepresentation of the AONB's statements, out of context. This is what was written:

In 2021 (ref 20210607), an application for two tanks, the AONB unit commented: Given the location, within a cluster of existing farm buildings, the AONB Unit raises no objection in principle to the proposed storage/fermentation tanks. In

order to minimise visual impact however, consideration could be given to colouring the tanks an appropriate muted colour, such as olive green. Further guidance on appropriate colours can be found in the AONB Units Guidance on the Selection and Use of Colour in the Kent Downs. This is considered particularly appropriate should the tanks be granted a permanent permission - we note that it is advised that the applicant is willing to accept a temporary consent of two years

But a lot had changed by 2023, with the application for 41 tanks temporary permission. This is what the AONB unite wrote then, on that application ref 20230454:

The site is located on the bottom of a dry valley and as such is in a particularly sensitive location, as dry valleys were one of the main targets of the AONB designation and are noted specifically as being one of the components of the 'dramatic landform and views' special qualities of the Kent Downs AONB. The proposal introduces 41 stainless steel fermentation tanks located externally. The nature of the tanks is such that they have a rather industrialised appearance that fails to meet the key policy test of conserving and enhancing the landscape and scenic beauty of the Kent Downs AONB.

It is noted that the application proposal is described as being for a temporary period. However, the application form does not refer to the application being temporary nor is there reference to this included in the Planning Statement. If the Council is minded to accept the principle the proposal and this would be a permanent permission, it is considered that mitigation should be incorporated to help ameliorate the impacts on views from Cutter Ridge Road. This should take the form of planting along the boundary with Cutter Ridge Road appropriate to landscape character. This would be in accordance with Principles SD2 and SD3 of the Management Plan.

As a final point, we note various refences to the 'Millington case' used as justification for a winery use being accepted as a considered to fall within the definition of an agricultural use. The judgement in the Supreme Court Case referred to was in connection with a scale of enterprise that was very different from that being considered under the current application. The Judgement states ' the making of wine or cider or apple juice on the scale with which we are concerned is a perfectly normal activity for a farmer engaged in growing wine grapes or apples'. The scale of the enterprise considered in this case related to the production of wine from grapes grown on a holding of just 3 ha so is of a clearly different scale to that which is being considered here.

5.2.11 This quote (officer's report, 41 tanks) lacks substance. The tanks do affect the wider landscape (see 5.2.8 above), and do not contribute to the character of the local built, historic and natural environment. They do the opposite.

Kind regards