Meopham Parish Council

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LOCAL COUNCIL AWARD SCHEME FOUNDATION

A Civility & Respect Pledge Council

FORMAL PLANNING CONSULTATION RESPONSE
20260815 – Woodlands Farm, Wrotham Road, Culverstone
Meopham Parish Council – Objection

Meopham Parish Council has considered the outline application for the development of 67 dwellings, public open space and associated works, with approval sought for the principal means of vehicular access from Newlands Lane.

The Parish Council recognises the significant housing shortfall within Gravesham and the applicant's reduction in the number of dwellings proposed and the provision of a landscape-led illustrative framework.

MPC's objection is therefore not founded simply upon the site's Green Belt designation, nor upon a general opposition to residential development at this location.

However, having reviewed the application documents and consultee material currently before the authority, the Parish Council considers that a number of matters material to the principle and acceptability of the proposed 67 dwellings remain insufficiently demonstrated.

1. Surface-water drainage, groundwater and wastewater infrastructure

Surface-water drainage and groundwater represent one of the Parish Council's principal unresolved concerns.

Kent County Council, as Lead Local Flood Authority, has expressly recommended that the application is not determined until a complete surface-water drainage strategy has been provided for review. Its response identifies the need for supporting information including evidence for assumptions such as infiltration rates, drainage calculations and sufficient information to demonstrate how the proposed system would operate. *[KCC Flood & Water Management consultation response, 18 August 2026]*

MPC is aware that an FRA and Drainage & SuDS Strategy form part of the submitted material. The relevant point is that KCC's formal consultation response does not consider that a complete strategy has been provided for review. That discrepancy should itself be resolved before determination rather than assumed away.

That carries particular significance under Policy F8 of the August 2026 National Planning Policy Framework, which requires major development incorporating sustainable drainage systems to take account of the advice of the Lead Local Flood Authority.

There also remains an important evidential dependency within the applicant's own case. The Planning Statement acknowledges that BRE365/borehole testing, seasonal groundwater information and land-quality assessment are required to establish whether infiltration is viable. It further accepts that any deep-bore infiltration solution would require specific technical justification, pollution-risk assessment and agreement from the relevant risk-management authorities. *[Applicant Planning Statement, August 2026, section 15.2-15.4]*

MPC is not asserting that an acceptable drainage solution is incapable of being achieved. Rather, the evidence necessary to demonstrate that such a solution is technically viable has not yet been completed.

The Environment Agency's response does not displace the LLFA's position. The Agency raises no objection subject to a contamination condition, but confirms that the site is located within Groundwater Source Protection Zone 3 and upon a principal aquifer. This reinforces the importance of establishing the acceptability of the eventual infiltration and pollution-control strategy through appropriate evidence. *[Environment Agency consultation response, 8 September 2026]*

EXTRACT 1 - KCC Flood & Water Management

Application No: 20260815

Location: Woodlands Farm , Wrotham Road, Culverstone, Gravesend Kent

Proposal: Outline planning application for the development of 67 dwellings, public open space and associated works, with approval sought for the principal means of vehicular access from Newlands Lane. All other matters are reserved.

Thank you for your consultation on the above referenced planning application.

Unfortunately no surface water drainage strategy has been provided for the proposed development. We would therefore recommend the application is not determined until a complete surface water drainage strategy has been provided for review.

At a minimum, a drainage strategy submission must comprise:

- A location plan
- A site layout

Source: KCC consultation response, 18 August 2026. Extract reproduced from the statutory consultee response.

Southern Water raises a separate but potentially mitigable infrastructure issue. Its capacity assessment identifies that additional foul flows may increase the risk of foul flooding, with reinforcement potentially required and occupation needing to align with its delivery. Southern Water does not object on network-capacity grounds and proposes phasing and conditions as the appropriate mechanism. *[Southern Water consultation response, 21 August 2026]*

MPC therefore does not rely upon foul-network capacity as a standalone ground of objection, but considers the matter relevant to the overall infrastructure position.

2. Current Green Belt policy and the sustainable-location requirement

The applicant's Planning Statement expressly identifies the December 2024 NPPF, amended in February 2025, as the operative national policy and structures its principal Green Belt case around former paragraphs 155, 158 and 11(d). *[Applicant Planning Statement, August 2026, sections 6.3 and 6.6]*

The national policy position has since changed materially. The August 2026 NPPF replaces the December 2024 Framework, and its decision-making policies are material considerations from the date of publication.

MPC does not suggest that this invalidates the application or renders the previously submitted technical evidence irrelevant. It does, however, mean that the proposal must now be assessed having regard to the current national decision-making framework, alongside the statutory development-plan starting point.

Policy GB7(1)(g) provides a route by which development on grey-belt land may be regarded as not inappropriate development, but only where its requirements are satisfied cumulatively. These include evidenced unmet need, a sustainable location with particular reference to Policy TR3 and, for major housing development, compliance with Policy GB8.

MPC accepts that there is evidenced unmet housing need. The current Framework confirms that GB8 applies to major housing proposals on Green Belt sites and includes affordable housing, necessary infrastructure improvements and publicly accessible green space within the Golden Rules.

The material issue for present purposes is the separate sustainable-location requirement.

MPC does not need to reach a definitive conclusion on the site's technical grey-belt classification in order to identify this policy issue. Even if grey-belt classification is accepted, that does not in itself satisfy GB7(1)(g).

Policy TR3 provides that proposals capable of generating a significant amount of movement, having regard to the context of the area, should be located where they can support sustainable patterns of movement. The location should limit the need to travel, particularly by private car, and offer a genuine choice of transport modes. The policy expressly recognises rural circumstances while still requiring opportunities to improve walking, wheeling, cycling and public transport to be taken where available.

There are material tensions between that test and the applicant's own accessibility evidence.

The Walking & Cycling Audit records that the existing Wrotham Road footway is obstructed by a mature tree, preventing use by wheelchair users and those with pushchairs. The alternative 2.5m country path proposed by the applicant would itself be unlit, as is the adjoining A227. *[Applicant Walking & Cycling Audit, July 2026, p.4]*

The audit separately records high traffic flows on the A227 and identifies the A227 itself as the current cycling route. It also identifies walking journeys of approximately 51 minutes to Meopham Secondary School and 50 minutes to Meopham Medical Centre, whilst the approach along part of Newlands Lane is recorded as a narrow road with no footpath. *[Applicant Walking & Cycling Audit, July 2026, pp.5, 8 and photographic audit item 47]*

MPC acknowledges the countervailing evidence. Culverstone Green Primary School and the Post Office are considerably closer, bus stops are located near the site and national policy does not require rural development to eliminate private-car journeys.

However, significantly, the applicant's own Planning Statement acknowledges that the weight to be afforded to its sustainability conclusion depends upon KCC's assessment and upon demonstrating delivery and land control for the proposed off-site measures. *[Applicant Planning Statement, August 2026, sections 8.5 and 23.1]*

The question is therefore not whether some sustainable travel opportunities exist. It is whether, taking the evidence as a whole and applying the current TR3 test, the authority can be satisfied that a development of 67 dwellings at this location would provide the requisite sustainable pattern of movement and genuine choice of modes.

That finding has a direct Green Belt consequence. If the sustainable-location requirement in GB7(1)(g)(iii) is not demonstrated, the proposal cannot rely upon GB7(1)(g) simply because the site may constitute grey belt and there is evidenced housing need.

EXTRACT 2 - Applicant's Walking & Cycling Audit

The internal development road network consists of a 5.5m wide spine road, with secondary streets at 4.8m wide. Each of the on-site roads have the benefit of a 2m footway on one or both sides, to ensure good pedestrian connectivity on site.

A new 2.5m wide country footpath has been proposed off site to improve pedestrian connectivity between the development and the local shopping facilities located to the north.
Whilst an existing footway is present along Wrotham Road, a mature tree obstructs part of the route, preventing access for wheelchair users and those with pushchairs. The proposed footpath provides an alternative, accessible route, improving pedestrian permeability and encouraging sustainable travel to nearby facilities. The proposed arrangement is illustrated on Drawing RSPD 6348-04 – Proposed New 2.5m Country Footpath, included within the appendices of the transport statement which this report accompanies.

Whilst it is acknowledged that the proposed footpath is not lit, this is consistent with the general area as the A227 highway through this route is also unlit.

Source: RSPD Walking & Cycling Audit, July 2026, printed p.4. Applicant's own evidence records both the obstructed existing footway and the unlit proposed alternative route.

3. Principal vehicular access and transport evidence

The principal means of vehicular access from Newlands Lane warrants particular scrutiny because access is being sought for approval at outline stage. Appearance, landscaping, layout and scale are reserved; the principal access is not.

The applicant itself states that the outline determination must therefore address both the principle of 67 dwellings and whether a suitable principal access can be achieved. *[Applicant Planning Statement, August 2026, section 2.2]*

The Planning Statement also records the access as remaining subject to KCC assessment, Road Safety Audit and detailed highway approval. *[Applicant Planning Statement, August 2026, Appendix A - highway access]*

The Parish Council further considers that the trip-generation evidence warrants scrutiny. The submitted TRICS material shows an actual selected range of 51 to 51 dwellings, consisting of one suburban residential survey site, subsequently used to derive trip rates for this 67-dwelling rural-edge proposal. *[Applicant Transport Statement, July 2026, TRICS appendix]*

MPC does not contend that reliance upon a single TRICS comparator is inherently invalid. Its concern is narrower: where the resulting trip rates form part of the evidence supporting the acceptability of a principal access being determined at outline stage, the representativeness of that comparator should be satisfactorily justified.

This is also relevant to Policy TR6 of the current NPPF, which requires transport evidence to consider reasonable future scenarios, relevant times of day, potential cumulative impacts, multimodal trip generation and the promotion of sustainable modes.

This is consistent with the adopted development plan. Policy CS11 of the Gravesham Local Plan Core Strategy requires new development to mitigate its impact upon the highway and public-transport networks and, where appropriate, to provide Transport Assessments and Travel Plans to secure travel choice and sustainable opportunities for travel.

National Highways' no-objection response does not determine this local issue. National Highways expressly confines its assessment to the Strategic Road Network and states that local-road and active/sustainable transport matters fall to Kent County Council Highways. *[National Highways consultation response, 2 September 2026]*

Its conclusion regarding the A2, M20 and M26 should therefore not be interpreted as an endorsement of the suitability of Newlands Lane, the local A227 environment or the detailed principal access.

4. Landscape effects and completeness of the evidence base

MPC considers that the landscape issue should be distinguished from the technical definition of grey belt.

Gravesham Borough Council's Stage 2 Green Belt Study identifies parcel CG7 as predominantly open and uncontained, with the land perceived as countryside and having a strong relationship with the countryside. The study assesses the parcel's contribution to safeguarding the countryside from encroachment as Significant and the overall harm from release as High. It further records that there is no potential for a reduced release within the parcel that would result in less harm to Green Belt purposes. *[GBC Stage 2 Green Belt Study, August 2020, Appendix A, parcel CG7, pp. A-47 to A-49]*

MPC recognises the proper limitation on that evidence. Green Belt purpose (c) - safeguarding the countryside from encroachment - does not form part of the current technical definition of grey belt. It would therefore be incorrect to treat countryside encroachment alone as defeating grey-belt status.

MPC also recognises that the Stage 2 Study is strategic plan-making evidence and is not, by itself, determinative of the application-specific landscape effects.

However, the resulting landscape and countryside effects remain material considerations in their own right.

That distinction is important because the applicant's planning balance repeatedly relies upon landscape containment, retained vegetation and the proposed green framework to moderate the effects of 67 dwellings, whilst simultaneously stating that the formal landscape effects and mitigation remain to be tested through the LVIA. *[Applicant Planning Statement, August 2026, sections 11.3 and 23.3]*

The applicant also acknowledges that the site lies within the Meopham Downs Landscape Character Area and contributes to the rural edge and setting of Culverstone Green. *[Applicant Planning Statement, August 2026, section 3.2]*

MPC's concern is therefore evidential rather than generic. Where landscape mitigation is relied upon as an important component of both the Green Belt case and the overall planning balance, the authority should have sufficiently complete landscape evidence to determine whether the claimed mitigation is capable of achieving the effect attributed to it.

Conclusion

Meopham Parish Council has deliberately focused its representation upon a limited number of substantive planning matters rather than raising a wider catalogue of secondary concerns.

The Council acknowledges the benefits of the proposal, including additional housing, the landscape/open-space framework. It also recognises that some of the outstanding matters identified above may be capable of resolution through further technical evidence, amendment, mitigation or appropriately secured infrastructure.

However, outline permission would establish the principle of 67 dwellings and approve the principal vehicular access. The Parish Council therefore considers that matters fundamental to those decisions should be demonstrated to an appropriate evidential standard before permission is granted, rather than being assumed capable of resolution at a later stage.

On the information currently before the authority, Meopham Parish Council does not consider that the principle of 67 dwellings has yet been adequately demonstrated and therefore objects to the application.

Yours faithfully

[redacted]

Lisa Winter
Clerk and Responsible Financial Officer