

Dear Planning Department,

I am writing to object to the above application but would like my name and address redacted when this is published publically.

I live at **Avoca, Newlands Lane, Culverstone**, directly opposite the application site, and am therefore very familiar with the site, Newlands Lane and the surrounding area.

I recognise the need for additional housing, including affordable housing, and I appreciate that the applicant argues that the site constitutes “grey belt” land under current national planning policy. My objection is not based simply on the fact that the land is within the Green Belt. Even if the Council concludes that the site falls within the current definition of grey belt, that does not automatically make development acceptable. The proposal must still satisfy the other requirements of the National Planning Policy Framework and the development plan.

For the reasons below, I do not consider that the application as currently submitted demonstrates that 67 dwellings can be acceptably accommodated on this site.

1. Landscape character, countryside encroachment and the rural edge of Culverstone Green

The proposal would represent a substantial extension of built development into presently open countryside south of Culverstone Green.

This concern is supported by Gravesham Borough Council's own Green Belt evidence. The site falls within the area assessed as **CG7** in the Council's Stage 2 Green Belt Study. The Council's assessment describes this land as predominantly open and uncontained and identifies Newlands Lane/Whitepost Lane as contributing to the distinction between the existing settlement and the Green Belt countryside beyond.

Most significantly, Gravesham assessed the harm arising from release of CG7 as **HIGH**, identifying significant countryside encroachment and a major weakening of the integrity of the adjoining Green Belt.

This appears difficult to reconcile with the applicant's description of the application site as a “contained, edge-of-settlement parcel”.

The indicative layout demonstrates the significance of the change. This would not simply be a limited rounding-off immediately adjoining existing development. The proposed estate, its roads and dwellings would extend substantially into the existing open land south of Newlands Lane, permanently changing its character from countryside to residential development.

Gravesham's recent housing-land evidence for other sites around Culverstone also recognises the importance of gaps in development, views into the wider countryside,

the rural character of Wrotham Road and maintaining appropriate landscape buffers at the settlement edge.

I therefore consider that the proposal raises substantial concerns under the NPPF's Green Belt and landscape policies and Gravesham Local Plan Core Strategy Policies **CS02 and CS12**.

2. Absence of the Landscape and Visual Impact Assessment

These concerns are particularly important because the applicant does not appear to have submitted the Landscape and Visual Impact Assessment (LVIA) upon which its own Planning Statement relies.

The Planning Statement repeatedly states that the LVIA **will** formally assess or document the landscape and visual effects of the proposal.

This is not a minor detailed matter which can simply be left until reserved matters. The Council is being asked through this outline application to decide whether the principle of constructing **67 dwellings on this particular site** is acceptable.

Given that Gravesham's own evidence assesses release of the relevant Green Belt parcel as causing high harm, I do not understand how the Council can robustly conclude that the proposed scale of development would have acceptable landscape and settlement-edge effects before the applicant has provided the formal assessment which it says will demonstrate that conclusion.

I therefore request that the application is not determined until the necessary landscape evidence has been submitted, made publicly available and properly assessed.

3. Whether the site is a sustainable location for 67 dwellings

I am also concerned that the application has not adequately demonstrated that the site satisfies the **sustainable-location requirement in paragraph 155(c) of the NPPF**.

I accept that Culverstone is served by buses and has some local facilities. My objection is therefore not that public transport or services are completely absent.

However, the applicant's own Walking and Cycling Audit identifies significant limitations. Its accessibility information indicates walking journeys of approximately **50 minutes to a GP surgery and 51 minutes to a secondary school**, with the main supermarket several miles away.

The applicant's own assessment also identifies limited formal pedestrian crossing provision, parts of the relevant routes without street lighting, no dedicated cycle infrastructure and cycling principally involving the A227, which it describes as carrying high traffic flows. It also assesses existing pedestrian accessibility for disabled users as poor.

These are material considerations when deciding whether residents of 67 additional dwellings would have a realistic choice of transport modes or whether everyday journeys would predominantly depend upon private cars.

The applicant refers to possible improvements to pedestrian routes, crossing facilities and other sustainable transport measures. Before determining the application, I ask the Council to establish precisely which measures are necessary, whether they are technically acceptable to KCC Highways, whether they are actually deliverable and whether their implementation would be secured.

This is particularly relevant to **Core Strategy Policy CS11**, which seeks sustainable transport and appropriate walking and cycling connections, as well as the sustainable-location requirements of the NPPF.

Recent Gravesham decisions concerning substantial residential development on Green Belt/grey-belt land also demonstrate that grey-belt status does not by itself establish that a site is sustainably located. Each application must be assessed on its individual circumstances.

4. Surface-water drainage, existing flooding on Newlands Lane and local flood history

I have particular concerns regarding surface-water drainage because I live directly opposite the application site at Avoca, Newlands Lane and have first-hand experience of existing surface-water flooding at this location.

During periods of heavy rainfall, substantial surface water flows onto and along **Newlands Lane**. On occasions this has been sufficient to **flood the front garden of my property**. This is an existing and recurring local problem which I have personally experienced, rather than a theoretical concern arising solely from the proposed development.

The wider history of surface-water flooding in Culverstone is also documented by Kent County Council. Following the serious flooding of **10 June 2019**, KCC carried out a formal Section 19 flood investigation covering Vigo and Culverstone. That investigation found that prolonged heavy rainfall saturated the ground, after which increased surface-water flows overwhelmed drainage infrastructure. KCC recorded that runoff from impermeable areas combined with **overland flows from the surrounding rural catchment**, contributing to significant flooding within Vigo and Culverstone. Further significant flooding affected the Culverstone Valley later in 2019.

That history is particularly relevant to this application. The proposal would introduce 67 dwellings together with estate roads, driveways and other hard surfaces onto land which is currently predominantly undeveloped and permeable, immediately opposite a part of Newlands Lane where surface-water runoff already affects neighbouring property.

I am therefore particularly concerned that the application does not presently demonstrate how the change in the site's drainage characteristics will affect the existing pattern of runoff during periods of prolonged or intense rainfall.

I note that KCC, as Lead Local Flood Authority, has reviewed the application and stated that **no complete surface-water drainage strategy has been provided**. KCC has consequently recommended that the application **should not be determined until a complete surface-water drainage strategy has been submitted and reviewed**.

In light of both the documented history of surface-water flooding within Culverstone and my own direct experience of runoff from Newlands Lane flooding my front garden, I consider it essential that the drainage implications are established **before the principle of this development is approved**, rather than being left to assumption or dealt with inadequately at a later stage.

I am not asserting that the proposed development will necessarily cause flooding. However, given the existing local problem and the scale of the proposed change from open land to residential development, the applicant should be required to demonstrate through appropriate hydrological and drainage evidence that:

- the development will not increase the rate or volume of surface-water runoff affecting Newlands Lane or neighbouring properties;
- the proposed drainage system has sufficient capacity for the appropriate design storm events, including the required climate-change allowance;
- exceedance flows during events beyond the design capacity will be safely contained or routed without increasing flood risk elsewhere;
- the existing overland flow paths and catchment behaviour have been properly identified and accounted for; and
- the proposed SuDS arrangements are technically deliverable, appropriately maintained for the lifetime of the development and acceptable to the Lead Local Flood Authority.

Until that evidence has been supplied and independently assessed, I do not consider that Gravesham can safely conclude that the development complies with **Core Strategy Policy CS18 or national policy relating to flood risk and sustainable drainage**.

I therefore strongly support the Lead Local Flood Authority's recommendation that **the application should not be determined in its present form**.

5. Vehicular access from Newlands Lane

Unlike layout, appearance, scale and landscaping, the **principal means of vehicular access from Newlands Lane is being submitted for approval at this stage**.

Newlands Lane is presently a rural road forming part of the existing transition between Culverstone Green and the countryside. The introduction of the principal access

serving 67 dwellings would materially change its function and the amount and nature of traffic using it.

I ask the Council to give considerable weight to KCC Highways' assessment of the proposed access, including its geometry and visibility, pedestrian safety, the relationship with Wrotham Road/A227, predicted vehicle movements and whether all highway and active-travel improvements necessary to support the development can actually be delivered and secured.

Until that assessment is complete, I do not consider that the acceptability of the access should be assumed.

6. Conflict with the established spatial strategy

The application proposes a substantial new residential development beyond the existing rural settlement and into the surrounding countryside.

I recognise that Gravesham currently has a significant housing-land-supply shortfall and that this is an important material consideration. I also recognise that national policy has changed to facilitate appropriate development on grey-belt land.

Nevertheless, **Core Strategy Policy CS02** continues to establish the Borough's spatial strategy, directing development towards appropriate sustainable locations and requiring development outside defined rural settlements to be compatible with national Green Belt policy.

The housing-supply position does not remove the requirement for this particular development to be demonstrated as acceptable in terms of landscape, Green Belt purposes, sustainable accessibility, drainage, infrastructure and other material considerations.

7. Infrastructure and the NPPF Golden Rules

The applicant proposes 50% affordable housing. I recognise that this would be a significant benefit of the proposal.

However, the national “Golden Rules” applicable to major housing development on relevant Green Belt land concern not only affordable housing but also the infrastructure necessary to support development and accessible green space.

The applicant's general commitment to make appropriate contributions should not substitute for establishing what additional demands 67 dwellings would create for education, healthcare, transport and other infrastructure and demonstrating that the mitigation considered necessary by the relevant authorities will actually be secured.

I therefore ask Gravesham to ensure that all relevant infrastructure consultees have assessed the development and that the necessary provision and contributions are identified and secured before any permission is granted.

8. Agricultural land

The applicant's Planning Statement also refers to a site-specific Agricultural Land Classification assessment which **will** confirm the agricultural grade of the land.

That assessment does not appear to have been submitted.

I do not therefore suggest that the land has been demonstrated to constitute best and most versatile agricultural land. Equally, the applicant has not demonstrated that it does not.

The Council should establish the agricultural classification before determining the application so that any loss of agricultural land can be properly considered in the planning balance.

Conclusion

I recognise both Gravesham's need for housing and the significant benefit represented by the proposed affordable housing. However, housing need does not mean that every site capable of meeting the technical definition of grey belt is automatically suitable for development.

In this case there is substantial existing evidence concerning the sensitivity of this countryside edge, while important application-specific evidence remains outstanding.

In particular:

- Gravesham's own Green Belt evidence identifies **high harm** from release of the relevant countryside;
- the applicant has not submitted the **LVIA** upon which its landscape conclusions expressly rely;
- significant questions remain over whether this location provides genuinely sustainable access to everyday services and facilities;
- the principal access from **Newlands Lane** is being determined now and requires robust highway assessment;
- the applicant has not supplied the complete surface-water drainage strategy required by the **Lead Local Flood Authority**, despite existing surface-water runoff and flooding being experienced on Newlands Lane; and
- other evidence, including the Agricultural Land Classification assessment, remains outstanding.

I therefore respectfully request that **planning permission is refused**.

Yours faithfully



Newlands Lane

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