

Comments summary

Dear Sir/Madam,

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

Comments were submitted at 28/08/2026 1:27 PM from [REDACTED]

Application Summary

Address:	Woodlands Farm Wrotham Road Culverstone Gravesend Kent DA13 0RQ
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.
Case Officer:	Ms Amanda Cue

[Click for further information](#)

Customer Details

Name:	[REDACTED]
Email:	[REDACTED]
Address:	[REDACTED] Wilsons Way Meopham Gravesend Kent

Comments Details

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

Reasons for comment:

Comments:

I OBJECT to this application and ask that it be refused.

1. THE APPLICATION IS INCOMPLETE AND CANNOT BE DETERMINED
Kent County Council, as Lead Local Flood Authority, states no surface water drainage strategy has been provided and recommends the application is not determined until one is submitted and reviewed. The Planning Statement asserts such a strategy forms part of its evidence base. The statutory consultee does not agree.

Southern Water reports insufficient information and inadequate foul network capacity for schemes of 51 units and over, warning of increased foul flooding risk.

By the applicant's own admission these are outstanding: the Landscape and Visual Impact Assessment; Agricultural Land Classification; Phase 1 contamination assessment; noise and air quality screening; the water quality assessment; infiltration and groundwater testing; a coordinated Ecological Impact Assessment; the open space schedule; the Stage 1 Road Safety Audit; and the off-site biodiversity units.

An outline application may reserve detail. It may not reserve the evidence on which the principle depends. Landscape harm, Green Belt harm, agricultural land loss and water quality in a Source Protection Zone are all principle-critical.

2. LANDSCAPE HARM HAS NOT BEEN ASSESSED

The site is in the Meopham Downs Landscape Character Area, close to the Kent Downs National Landscape, and rises some five metres to its southern boundary. No LVIA has been submitted.

Natural England has expressly declined to confirm there would be no significant adverse effect on landscape or visual resources, or on the statutory purpose of the National Landscape. It directs the Council to NPPF paragraphs 189 and 190 and to the section 245 duty under the Levelling-up and Regeneration Act 2023, which applies to proposals outside a designation affecting its natural beauty, and advises that an LVIA should be provided with the proposal.

The Council cannot discharge a statutory duty on an assessment that does not exist.

3. THE GREY BELT CASE FAILS

The grey belt claim rests on pre-application officer advice given on an earlier, larger scheme. That is opinion, not a decision. The applicant relies on that document for grey belt while setting aside its advice to retain the house.

The Council's own Stage 2 Green Belt evidence rates this parcel as making a significant contribution to purpose (c) with high release harm. That independent evidence should outweigh the applicant's assertion of localised effect, and purpose (c) is relevant to paragraph 155(a), a cumulative test.

The Annex 2 grey belt definition excludes land where footnote 7 policies give a strong reason to refuse. Footnote 7 includes National Landscapes. Without an LVIA the Council cannot conclude footnote 7 does not apply, and so cannot conclude the site is grey belt. Paragraph 155 is unavailable, the development is inappropriate, the tilted balance is disapplied, and Very Special Circumstances are required. None are demonstrated.

4. HIGHWAY SAFETY - NEWLANDS LANE

The Transport Statement assesses the wider network, not the lane. On the applicant's own figures the scheme adds some 50 AM peak movements - about 3.8 times existing flow on Newlands Lane. The lane is effectively single track, unlit, without footway or passing places, and used by pedestrians, children walking to bus stops, dog walkers, horses and riders.

The applicant's survey records approximately 9,830 vehicles per day on the A227, 1,112 of them at 50mph or more. No Stage 1 Road Safety Audit has been undertaken, the Whitepost Lane junction is unassessed, KCC has not approved the access, and there is no cumulative assessment alongside Norwood Lane (150 homes, called in), Blackthorn Farm (at appeal) and Rose Farm, Istead Rise (154 homes).

5. BIODIVERSITY - A NET LOSS

The headline 28.65% gain is hedgerow units only. Area habitat falls from 25.37 to 17.80 units: a net loss of 29.82%. The 10.10 off-site units required are unpurchased, with no provider identified and no gain site registered. The Local Nature Recovery Strategy identifies the site for acid grassland and heathland creation; the ecologist downgraded its strategic significance because the layout does not suit it - but layout is a reserved matter.

6. WATER QUALITY

The site is in Groundwater Source Protection Zone 3. The strategy proposes deep bore soakaways into chalk on assumed, untested infiltration rates. The pollution assessment covers roof runoff only; roads and parking are unassessed. The Environment Agency should be consulted.

REQUEST

I ask that the application be refused. Alternatively, that it is not determined until the LLFA has a complete drainage strategy, an LVIA is submitted and re-consulted upon, the Kent Downs National Landscape Partnership and Environment Agency are consulted, and an ALC assessment provided. I ask that it go to Planning Committee.

Kind regards