

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 1:36 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:

SECOND REPRESENTATION. This supplements my comment of 28 August and does not replace it; the character limit prevented these grounds being included. Both should be reported to Members.

1. HERITAGE - THE NPPF 209 JUDGEMENT HAS NEVER BEEN MADE
The scheme demolishes Woodlands Farm, dating from c.1902. The Heritage Statement records that on 23 April 2026 the applicant's consultant asked Gravesham for comments on potential non-designated heritage assets, and that on 24 April the Council declined to comment outside a pre-application service. The applicant's consultant then concluded the building has no significance, partly because later extensions detract from its appearance.

NPPF 209 requires the decision-maker to make a balanced judgement on harm to a non-designated heritage asset. That judgement has not been made. The Council was invited to consider the question and declined; it cannot now discharge NPPF 209 by adopting the conclusion of a consultant retained by the party seeking demolition. Pre-application advice had in fact suggested retaining the house for its visual contribution - advice the applicant sets aside while relying on the same document as the foundation of its grey belt case.

I ask that the Conservation Officer assesses the building and records the NPPF 209 judgement before determination.

2. ARCHAEOLOGY - 47% OF THE SITE IS UNINVESTIGATED

The site is in an Archaeological Notification Area. The magnetometer survey covered c.1.8ha of a c.3.4ha site. The excluded area is the built-up north-west containing the farmhouse - the historic core of what the applicant accepts was likely a post-medieval farmstead, and the area of highest potential. No trial trenching has been done. KCC Archaeology's view should be obtained before determination.

3. AGRICULTURAL LAND - THE LOSS IS UNQUANTIFIED

The constraints record shows Grade 3 agricultural land; subgrade 3a is best and most versatile under NPPF 187(b). No Agricultural Land Classification survey has been submitted; the Planning Statement says one "will" confirm the grade. Natural England advises it is the authority's responsibility to hold sufficient ALC information regardless of scheme size. The Council holds none, and cannot weigh a loss it has not quantified.

4. SUSTAINABLE LOCATION - NPPF 155(c) FAILS

Meopham station is c.6.0km away. The medical centre and secondary provision are described only as within reasonable cycling distance, with no distance or journey time given. The Planning Statement confirms KCC's pre-application concerns about narrow unlit rural roads, missing footways and public transport limitations remain relevant. The mitigation offered is a country footpath and crossings - and the Statement concedes at §8.5, §14.2 and Appendix B that delivery and land control for these off-site measures are not demonstrated. A location is not made sustainable by works the applicant cannot show it can build.

5. THE GOLDEN RULES ARE ASSERTED, NOT SECURED

NPPF 158 weight requires compliance to be demonstrated. Here there are no unit numbers, tenure split, size mix or cascade for the 50% affordable housing; no section 106 drafted; the applicant arguing the £125,193 pre-application leisure figure be recalculated downwards; and open space quantum not assessed against standards. Significant weight should not attach to intentions.

6. TREES, HEDGEROWS AND ECOLOGY

Of the 230 trees offered as mitigation, 82 are in private gardens, excluded from the biodiversity metric and unsecured in perpetuity. Hedgerows H43, H71 and H78 are habitats of principal importance and likely important hedgerows under the 1997 Regulations - and §16.1 confirms the ecology report and tree removal plan have not been reconciled, so the extent of loss is unknown. Dormouse mitigation is contingent on that unresolved figure. Japanese knotweed is present with no method statement. Ancient woodland lies c.90m south-west, and the Forestry Commission's advice on buffer-zone effects is unaddressed.

7. PARKING AND THE RELIABILITY OF THE EVIDENCE

The claimed nine-space parking surplus is tested against a suburban category which §13.4 concedes is not agreed with KCC. The cycle standard requires 180 secure spaces; none are shown.

The Flood Risk Assessment's conclusion states it was prepared for commercial development at this site. The Planning Statement says deep bore infiltration would be exceptional; the drainage drawing shows it as the design.

8. DEFERRAL

The called-in Norwood Lane inquiry (150 homes, same parish, same landscape character area, same road network) opens 13 October and raises the identical grey belt and NPPF 155 questions. This deadline is 12 November. I ask the Council to seek an extension of time and defer until that decision is issued.

I ask that the application be refused, and that it be determined by Planning Committee.

Kind regards