

Representation objecting to planning application 20260815

Woodlands Farm, Wrotham Road, Culverstone, Gravesend, Kent DA13 0RQ

Application	20260815
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.
Applicant	Mr Leigh Dennis
Agent	Dream Design Develop Ltd
Case officer	Ms Amanda Cue
Validated	13 August 2026
Determination deadline	12 November 2026
Representation by	James Ferrin, Santa Maria, Wilsons Way, Meopham, Kent DA13 0DW
Position	Object

Status of this document

I have made two representations through the Council's Public Access portal, on 28 August 2026. The portal restricts each comment to 5,000 characters and my grounds of objection could not be set out within that limit.

This document consolidates my objection in full. It supplements the portal representations and does not replace or supersede them. I ask that this document is placed on the application file, is reported to Members in full, and is addressed in the officer's report.

1. Summary

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

The application is not finely balanced. It is, on the applicant's own account, incomplete. The Planning Statement identifies fifteen separate pieces of evidence that have not been submitted but which the applicant accepts are required, including the Landscape and Visual Impact Assessment, the Agricultural Land Classification assessment, the Phase 1 contamination assessment, noise and air quality screening, the water quality assessment, infiltration and groundwater testing, and a coordinated Ecological Impact Assessment.

Two statutory consultees say the same thing in blunter terms. The Lead Local Flood Authority reports that no surface water drainage strategy has been provided and recommends that the application is not determined. Southern Water reports insufficient information and inadequate foul network capacity, with an increased risk of foul flooding.

An outline application may properly reserve *detail*. It may not reserve the *evidence base on which the principle itself turns*. Landscape harm, Green Belt harm, agricultural land loss, water quality within a Source Protection Zone and highway safety are all principle-critical here. The Council cannot lawfully conclude that NPPF paragraph 155 is satisfied, or carry out the planning balance, on the material before it.

Beyond that threshold point, the substantive case fails on its merits. The grey belt argument rests on a pre-application officer opinion given on a different scheme, and sits against the Council's own Stage 2 Green

Belt evidence. The sustainability case does not survive contact with Newlands Lane. And the biodiversity headline conceals a 29.82% net loss of on-site habitat.

2. The application is premature and cannot be determined on the submitted evidence

2.1 What the statutory consultees say

Kent County Council as Lead Local Flood Authority (18 August 2026) advises that no surface water drainage strategy has been provided, and recommends that the application is not determined until a complete strategy has been supplied for review. It then sets out the minimum contents of such a submission: a drainage schematic, descriptions of key features, supporting assumptions including infiltration rates, a model network schematic and the LLFA's summary form.

This directly contradicts the Planning Statement, which asserts that a Flood Risk Assessment and Drainage & SuDS Strategy forms part of the submitted evidence base and that the site has a clear route to an acceptable drainage solution. The statutory drainage consultee does not accept that a strategy exists.

Southern Water (21 August 2026) records insufficient information and, under the heading of inadequate foul network capacity, confirms that a capacity check indicates the additional flows may increase the risk of foul flooding from the sewer network. It requires an occupation-phasing condition tied to delivery of network reinforcement, notes that reinforcement is endeavoured within 24 months of consent but that complex cases may take longer, and confirms that documentation demonstrating compliance with the Part H3 surface water hierarchy has not been provided.

Natural England (20 August 2026) gives landscape advice and states expressly that it is *not* confirming there would be no significant adverse effect on landscape or visual resources, or on the statutory purpose of the Kent Downs National Landscape. It directs the Council to NPPF paragraphs 189 and 190 and to the duty under section 245 of the Levelling-up and Regeneration Act 2023 — a duty which, Natural England is careful to record, applies to proposals *outside* a designated area that impact on its natural beauty. Its Annex A advises that where impacts are likely to be significant, a Landscape and Visual Impact Assessment should be provided *with the proposal* to inform decision making. None has been.

Natural England further advises that local planning authorities are responsible for ensuring they hold sufficient Agricultural Land Classification information to apply NPPF paragraphs 187 and 188, regardless of whether the scheme is large enough to trigger consultation with Natural England. The Council holds none for this site.

2.2 What the applicant concedes is outstanding

Missing evidence	Conceded at
Landscape and Visual Impact Assessment	§3.3, §11.3
Agricultural Land Classification survey	§3.2, §11.4
Phase 1 contamination assessment and conceptual site model	§19.1
Noise baseline screening / assessment	§19.2
Air quality screening	§19.4
Complete water quality assessment	Exec. summary, §15.4
BRE365 / borehole infiltration testing	§15.2

Seasonal groundwater information	§15.2
Coordinated Ecological Impact Assessment / ecology addendum	§16.7
Open space and play schedule assessed against standards	§20.1
Stage 1 Road Safety Audit and Designer Response	§13.3
Confirmation of the applicable KCC parking locational category	§13.4
Definitive alignment and legal width of PROW NS273	§14.3
Site-specific mineral safeguarding screening note	§6.6
Secured off-site biodiversity allocation (10.10 units)	§17.4

Several of these are not reserved-matters detail. The LVIA determines whether landscape harm is a strong reason for refusal, which in turn determines whether the site is grey belt at all, because the Annex 2 definition excludes land where footnote 7 policies would provide such a reason. The ALC determines whether best and most versatile land is being lost. The water quality assessment determines whether infiltration in a Source Protection Zone is safe. These go to principle, not to appearance, landscaping, layout or scale.

The Planning Statement itself acknowledges the distinction, stating that principle-critical confirmatory evidence will support determination rather than being deferred indiscriminately. That commitment has not been honoured.

The Council should either require the outstanding material and re-consult, or refuse. It should not seek to cure the deficit by condition. A condition cannot retrospectively supply the evidence on which the acceptability of the principle depends.

3. The Green Belt and grey belt case is not made out

3.1 The designations

The Council's constraints record confirms the site lies within the Metropolitan Green Belt (Approved), within the Rural Boundary (Adopted), within the Meopham Downs Landscape Character Area, on Grade 3 Agricultural Land, within Groundwater Source Protection Zone 3, and within an Archaeological Notification Area.

3.2 The grey belt conclusion rests on a pre-application opinion

The Planning Statement returns repeatedly to a single proposition: that the pre-application officer response under PRE20250148 concluded the site can be described as grey belt. This appears in the Executive Summary, at §4.2, §8.2, §8.3, §23.1 and §23.4, in the Conclusion, and twice in the Appendix B policy matrix.

That proposition cannot carry the weight placed on it.

- **Pre-application advice is not a decision.** It is officer opinion given without consultation, without third-party representations, without statutory consultee input and without the benefit of the evidence now before the Council. It attracts no weight in the section 38(6) exercise.
- **It was given on a materially different scheme.** The Planning Statement states that the current 67-dwelling framework materially reduces an earlier quantum, and that the pre-application response criticised the earlier concept for excessive density, absent open space and hard-landscape dominance. Advice given on a superseded layout cannot be transplanted onto a new one and treated as a finding.

- **The applicant discards the same advice where it is inconvenient.** The pre-application response suggested retaining the existing house because of its visual contribution. §18.1 and Appendix A record that the current scheme retains demolition. The applicant cannot rely on that response as authoritative on grey belt while setting it aside on the built form.

3.3 The Council's own Green Belt evidence points the other way

§8.4 acknowledges — briefly, and without engaging with it — that the Council's Stage 2 Green Belt evidence assesses this parcel as making a **significant contribution to purpose (c)** with **high release harm**.

The applicant's answer is that purpose (c) does not form part of the Annex 2 grey belt definition. That is correct as far as it goes, but it does not dispose of the point.

- Purpose (c) is squarely relevant to **paragraph 155(a)**, which asks whether development would fundamentally undermine the purposes of the remaining Green Belt *taken together*. Purpose (c) is one of those purposes and cannot be excluded from a test that is expressly cumulative.
- It is relevant to the **planning balance**, where Green Belt harm attracts substantial weight.
- It is the Council's **own commissioned evidence**, prepared for plan-making and therefore free of applicant interest. It should carry considerably more weight than the applicant's assertion that the effect is strictly localised.

The applicant offers no site-specific Green Belt assessment to displace it. §8.4 states that the final Green Belt evidence will document the conclusion in the wider context. That evidence does not yet exist.

3.4 The grey belt gateway itself fails

The Annex 2 definition of grey belt excludes land where the application of the policies in footnote 7 would provide a strong reason for refusing or restricting development. Footnote 7 includes National Landscapes. Natural England has declined to confirm that there would be no significant adverse effect on the statutory purpose of the Kent Downs National Landscape, and has advised that an LVIA is required to inform the decision.

Until that assessment exists, the Council cannot rationally conclude that footnote 7 does not bite. It therefore cannot conclude that the site is grey belt. **The entire paragraph 155 route is unavailable on the present evidence.**

3.5 The consequence for the tilted balance

The applicant's decision-making chain runs: no five-year supply, therefore paragraph 11(d) engaged; paragraph 155 satisfied; therefore not inappropriate development; therefore the Green Belt provides no strong reason against; therefore the tilted balance applies.

Remove the third step and the chain collapses. If paragraph 155 is not satisfied, the development is inappropriate development in the Green Belt. Green Belt is a footnote 7 designation. The tilted balance is disappplied, and the applicant must instead demonstrate Very Special Circumstances, giving substantial weight to Green Belt harm.

The alternative Very Special Circumstances case at §23.4 is thin. It recites the same benefits and asserts that they clearly outweigh the harm. It does not attempt to quantify the Green Belt harm it is weighing against, because without an LVIA or a site-specific Green Belt assessment it cannot.

4. Landscape harm has not been assessed

This is the single most serious evidential gap in the application.

The site lies within the Meopham Downs Landscape Character Area and forms part of the rural setting of Culverstone Green. It lies close to the Kent Downs National Landscape. Ground levels rise from approximately 184.20m AOD at the northern edge to approximately 189.30m AOD at the southern boundary — a five-metre rise across the site, meaning built form would sit progressively higher against the southern skyline.

Against that context, the application contains:

- No Landscape and Visual Impact Assessment
- No viewpoint analysis or zone of theoretical visibility
- No assessment of effects on the setting or special qualities of the Kent Downs National Landscape
- No assessment of effects from public rights of way, including NS273
- No landscape capacity or sensitivity work

The applicant's landscape case is a planting schedule. 230 trees are offered as mitigation. The BNG assessment records that **82 of those are within private gardens** and do not contribute to the metric — and, being in private curtilages, they are neither secured in perpetuity nor reliable as landscape structure. The effective mitigation is 148 trees, not 230.

NPPF paragraph 189 requires great weight to be given to conserving and enhancing landscape and scenic beauty in National Landscapes and states that the scale and extent of development in these areas should be limited. Section 245 of the Levelling-up and Regeneration Act 2023 imposes a duty on the Council to seek to further the statutory purposes of the National Landscape, extending to proposals outside the designation which affect its natural beauty. **The Council cannot discharge a statutory duty on the basis of an assessment that has not been carried out.**

I invite the Council to consult the Kent Downs National Landscape Partnership, as Natural England expressly recommends.

5. The site is not a sustainable location (paragraph 155(c))

5.1 The applicant's own figures

- Meopham Railway Station is approximately **6.0 km** from the site.
- The primary school and Post Office are approximately 0.5 miles, estimated at 10–12 minutes on foot.
- The medical centre and secondary school provision are described only as within reasonable cycling distance. No distance, journey time or route assessment is given.
- Bus routes 306, 308, 416 and 695 are listed, with the Walking & Cycling Audit acknowledging that operating days and frequencies vary and should be stated accurately — that is, they have not been.
- Existing footway widths are recorded as approximately 1m to 2.5m.

5.2 KCC's concerns are recorded as unresolved

§14.1 states that KCC's pre-application concerns about narrow and unlit rural roads, missing footway sections and public transport limitations remain relevant. The application does not resolve them; it proposes to mitigate them.

Critically, the Planning Statement concedes at §8.5, §14.2 and in its Appendix B matrix that **delivery and land control for the off-site measures have not been demonstrated**. A sustainability case that depends on works the applicant cannot show it is able to deliver is not a sustainability case.

5.3 Consistency with the Council's own evidence

Culverstone Green has one convenience shop, one petrol station and a primary school. Every other daily need — secondary education, GP, supermarket, employment, rail — requires a car journey. The Sustainability Appraisal supporting the emerging Local Plan rejected the nearby Blackthorn Farm site on sustainability grounds. It would be difficult to reconcile a conclusion that this location is sustainable with that assessment.

6. Highway safety and the capacity of Newlands Lane

6.1 The Transport Statement measures the wrong network

The Transport Statement predicts approximately 50 two-way movements in the AM peak and 59 in the PM peak, and concludes that the effect on the *wider highway network* is unlikely to be noticeable. That conclusion is true and irrelevant. The relevant question is the effect on Newlands Lane.

On the applicant's own survey data this equates to approximately **3.8 times the existing AM flow** and **2.8 times the existing PM flow** on Newlands Lane itself. A near-fourfold increase concentrated onto a single-track rural lane is a material change by any measure. The Transport Statement does not assess it.

6.2 The lane

Consistent local evidence describes Newlands Lane as effectively single track, in places approximately 2.7m wide, without footway, without passing bays, unlit, with overgrown hedging, used by pedestrians, dog walkers, horses and riders, and by children walking to and from bus stops. It provides access to Culverstone Green recreation ground. Residents report vehicles using private driveways as passing places and garden walls being struck repeatedly. A 2.55m-wide delivery vehicle on a 2.7m carriageway is not a theoretical concern.

6.3 The junctions

- **Newlands Lane / A227 (Wrotham Road):** the applicant's survey records approximately 9,830 vehicle movements per average day on the A227, with prevailing speeds exceeding the 40mph limit and 1,112 vehicles recorded at 50mph or more. The Transport Statement identifies visibility requirements of approximately 94.0m and 90.7m at the Wrotham Road junction.
- **Newlands Lane / Whitepost Lane:** described locally as requiring a three-point manoeuvre in the carriageway to complete a left turn. The Transport Statement does not assess this junction, despite it being an obvious alternative route for new residents.

6.4 Outstanding highway matters

- No Stage 1 Road Safety Audit or Designer Response has been undertaken.
- KCC has not agreed the access. The Planning Statement describes its conclusions as the applicant's case only.
- The applicable KCC Vehicle Parking Standards locational category has not been agreed. The 131-space provision is tested against an assumed suburban benchmark with no written agreement behind it. §13.4 concedes this and states the category should be confirmed before any surplus is relied upon — yet the

nine-space surplus is presented as a benefit in the Executive Summary.

- Applying the current one-space-per-bedroom cycle standard to the indicative mix requires capacity for **180 secure cycle spaces**. None is shown.
- Active Travel England has confirmed it will not comment because the scheme falls below the 150-dwelling statutory threshold. That is a jurisdictional statement, not an endorsement.

6.5 Cumulative impact

No cumulative assessment of any kind — highway, drainage, education, health or landscape — has been carried out. The following major schemes are live in the immediate area, all discharging onto or across the same A227 corridor:

Site	Reference	Scale	Status
Land West of Norwood Lane, Meopham	APP/K2230/V/26/3378708 (app 20251116)	150 dwellings	Called in by the Secretary of State; inquiry opens 13 October 2026
Blackthorn Farm, Culverstone Green	Appeal 6007106 (app 20250802)	c.100 dwellings	At appeal
Rose Farm / Downs Road, Istead Rise	20251233	154 dwellings	Under consideration

7. Drainage, groundwater and water quality

7.1 The LLFA position

As set out at section 2.1, the statutory drainage consultee reports that no surface water drainage strategy has been provided and recommends non-determination. That alone is sufficient reason to refuse or defer.

7.2 Deep bore soakaways in a Source Protection Zone

The Flood Risk Assessment and Drainage Strategy proposes to convey runoff through swales and attenuation basins before discharging into a **series of deep bore soakaways**, discharging directly into the Lewes Nodular Chalk Formation. Drawing RSPD 6348-01 Rev A (07/08/26) shows boreholes BH1, BH2 and BH3. The site lies within **Groundwater Source Protection Zone 3**.

This creates a direct conflict within the applicant's own submission. The Planning Statement at §15.2 states that shallow and open SuDS should be prioritised and that deep bore infiltration would be an *exceptional* solution requiring specific technical justification, full pollution risk assessment and agreement in principle from the risk management authorities. The FRA does not present deep bore soakaways as an exception. It presents them as **the design**. The narrative document describes a drainage strategy that the engineering document does not contain.

7.3 Infiltration rates are assumed, not tested

The FRA confirms that ground investigation and infiltration testing have not been undertaken and that infiltration rates have been **assumed**. The drainage strategy drawing carries the same note: soakage rates are assumed and testing will be required before detailed design.

The entire attenuation design — the claim that runoff will be held to greenfield rates for the 1 in 100 year event plus 45% climate change allowance — rests on unverified assumptions about the permeability of the Chalk. If those assumptions are wrong the scheme does not work, and there is no fallback: with no

watercourse and a surface water hierarchy that runs out below infiltration, there is nowhere else for the water to go.

7.4 The water quality assessment is incomplete

The FRA's pollution hazard assessment considers only **residential roof areas**, classifies them as a very low hazard, and concludes that catchpits and silt traps are adequate mitigation.

It does not assess runoff from roads, driveways or parking areas — precisely the sources that carry hydrocarbons, metals and particulates, and precisely the sources of concern for groundwater within a Source Protection Zone. The CIRIA SuDS Manual C753 approach requires the full treatment train across all runoff sources. The Planning Statement effectively admits the gap at §15.4, stating that the final design must provide an appropriate treatment train for all runoff sources including roofs, roads and parking areas. Southern Water has separately confirmed that Part H3 hierarchy compliance documentation has not been provided.

The Environment Agency should be consulted. I would expect it to resist deep bore infiltration in SPZ3 without a full pollution risk assessment, which does not currently exist.

7.5 Foul drainage and surface water flooding of Newlands Lane

Foul flows are proposed to be pumped by a new pumping station and rising main to a public sewer on the opposite side of Wrotham Road. Southern Water confirms inadequate network capacity for schemes of 51 units and over and warns of increased foul flooding risk. Its requested phasing condition would tie occupation to reinforcement delivery on an open-ended timescale.

Local representations consistently report that the lower end of Newlands Lane near the A227 already floods in heavy rainfall, with water running off surrounding fields, and that existing infrastructure consists of soakaways already under pressure. Given the five-metre fall across the site toward the north, and given that infiltration performance is untested, this concern is well founded and has not been assessed.

8. Biodiversity: the headline conceals a substantial net loss

Component	Baseline	Post-development on site	Change
Area habitat units	25.37	17.80	-7.56 units (-29.82%)
Hedgerow units	3.92	5.05	+1.12 units (+28.65%)

The Planning Statement leads with a 28.65% on-site hedgerow-unit gain in its Executive Summary, at §23.2 and in the Appendix B matrix. That figure is real, but it is a *hedgerow* figure. Habitat, hedgerow and watercourse units are separate and non-transferable — a point the Planning Statement itself makes at §17.1.

The material fact is that the scheme destroys **almost 30% of the site's on-site area habitat**. Presenting a hedgerow gain as the headline biodiversity outcome, while a near-30% habitat loss appears only in the body text, is a presentational choice the Council should see through.

8.1 The off-site units are not secured

The shortfall of 10.10 off-site habitat units — equivalent to 20.20 Tier A1 statutory credits — has not been purchased, no provider has been identified, and no gain site has been registered. §17.4 confirms that completion remains subject to securing the provider and allocation. The BNG strategy is at present an intention.

8.2 The Local Nature Recovery Strategy has been sidestepped

§17.5 records that the Local Nature Recovery Strategy maps this site for potential **GL4.2 acid grassland and heathland creation**. The ecologist's response is that this habitat type is unsuited to the layout and spatial requirements of the proposal, and has therefore applied **low strategic significance** in the metric.

This is circular. The site is mapped for a priority habitat; the applicant's layout does not accommodate it; the applicant therefore downgrades the site's strategic significance, which reduces the biodiversity units the scheme must deliver. **Layout is a reserved matter**. It cannot be used to justify discounting a designation that exists independently of it. The Council should require the metric to be re-run applying the strategic significance the LNRS actually indicates.

8.3 Trees, hedgerows and protected species

- **Important hedgerows.** H43, H71 and H78 are habitats of principal importance and are considered likely to meet the Hedgerow Regulations 1997 definition of important hedgerows. §16.1 confirms that the Preliminary Ecological Appraisal's retention assumptions and the arboricultural removal plan **have not been reconciled**. The Council does not currently know how much important hedgerow would be lost, and the statutory notification procedure cannot be assessed on this submission.
- **Trees.** 62 individual trees, 10 groups, seven shrub groups and six hedges surveyed, including eight Category A and 22 Category B individual trees. Removals include a Category B group and partial group. The preliminary drainage layout interfaces with the root protection areas of T45, T49 and G48, and hedge H46 at the site entrance is accepted as not screened from wider viewpoints.
- **Bats.** Five species or species groups recorded in activity surveys, including Nathusius' pipistrelle. The site is of moderate suitability for foraging and commuting. A sensitive lighting strategy is proposed, but lighting is a reserved matter and is not secured.
- **Dormice.** Boundary scrub and hedgerow assessed as good quality dormouse habitat, with mitigation expressly contingent on habitat loss remaining limited to that described in the PEA — an assumption not yet established.
- **Invasive species.** A stand of Japanese knotweed is recorded near tree T27 on the southern boundary. No invasive species method statement has been submitted.
- **Ancient woodland.** The nearest ancient woodland lies approximately 90m south-west and the nearest priority deciduous woodland approximately 65m south-east. The Forestry Commission's response draws attention to NPPF paragraph 193(c) and to the joint Standing Advice, noting that impacts can arise from activities outside the designated area, including within buffer zones. No assessment of indirect or buffer-zone effects has been carried out.

9. Heritage: the Council has never assessed whether Woodlands Farm is a non-designated heritage asset

The application proposes demolition of Woodlands Farm, a building dating from approximately 1902.

The submitted Archaeology Desk-Based Assessment and Heritage Statement records that on 23 April 2026 the applicant's consultant, AB Heritage, emailed Gravesham Borough Council requesting preliminary comments and drawing specific attention to the potential for **non-designated heritage assets** not appearing on a Local List. On 24 April 2026 the Council declined to provide comments outside a pre-application service.

The applicant's consultant then assessed the building and concluded it holds no heritage significance, reasoning in part that later extensions detract from its aesthetic quality.

First, the judgement is the Council's to make. NPPF paragraph 209 requires that, in weighing applications affecting a non-designated heritage asset, a balanced judgement be made having regard to the scale of harm and the significance of the asset. That judgement has not been made by the decision-maker. The Council was expressly invited to consider the question and declined. It cannot now discharge the paragraph 209 obligation by adopting the conclusion of a consultant retained by the party seeking to demolish the building.

Second, the reasoning is unsound. Unsympathetic later alteration is not a recognised basis for concluding that a building of this age lacks significance. The correct approach is to assess the significance of the surviving historic fabric and to consider whether later work is reversible. The assessment does not undertake that exercise. The Heritage Statement's own source list includes the 1841 Tithe Map and the 1867, 1895 and 1907 Ordnance Survey maps, and it accepts that the site likely formed an isolated farmstead in the post-medieval period — indicating a farmstead of some antiquity, whatever the date of the present house.

It is also relevant that the Council's pre-application response suggested retaining the existing house because of its visual contribution — advice the applicant has set aside while continuing to rely on the same document as the foundation of its grey belt case. Selective reliance on the Council's own advice should not be accepted.

I ask that the Council's Conservation Officer formally assesses Woodlands Farm as a potential non-designated heritage asset, and that the paragraph 209 balanced judgement is carried out and recorded, before the application is determined.

9.1 Archaeology

The site lies within an Archaeological Notification Area. The geophysical survey undertaken by Kevin Cornwell between 10 and 12 June 2026 covered approximately **1.8 hectares** of an approximately **3.4 hectare** site — around 53% of the application area.

The area excluded was the built-up north-western part containing the farmhouse and ancillary buildings. That is precisely the area of highest archaeological potential, being the historic core of what the applicant's own assessment accepts was likely an isolated post-medieval farmstead. Within the surveyed area, Area 5 recorded a shallow linear feature and a possible infilled pit. No trial trenching has been carried out and no Written Scheme of Investigation has been agreed.

Where nearly half a site within an Archaeological Notification Area is unsurveyed, the Council cannot know whether the archaeological interest is capable of proportionate mitigation. KCC Archaeology's substantive view should be obtained and reported before determination.

10. Agricultural land

The Council's constraints record identifies the site as **Grade 3 agricultural land**. Subgrade 3a constitutes best and most versatile land for the purposes of NPPF paragraph 187(b).

No site-specific Agricultural Land Classification survey has been submitted. The Planning Statement confirms at §11.4 that such an assessment will confirm the grade and the extent of any BMV land.

Natural England's consultation response is directly in point. Its Annex A advises that local planning authorities are responsible for ensuring they hold sufficient ALC information to apply NPPF paragraphs 187 and 188, and states that this is the case regardless of whether the development is large enough to trigger consultation with Natural England. The Council holds no such information for this site.

The applicant's position is that any identified loss should be weighed against housing need and the scheme's benefits. That balancing exercise cannot be performed on an unquantified quantity; the Council would be weighing an unknown.

Natural England also draws attention to the Defra Construction Code of Practice for the Sustainable Use of Soils on Construction Sites and recommends that an appropriately experienced soil specialist advises on and supervises soil handling. No soil resource or soil management plan has been submitted.

11. The Golden Rules are asserted, not secured

The applicant relies on NPPF paragraph 158, which affords significant weight in favour of development complying with the Golden Rules at paragraphs 156 to 159. That weight is available only where compliance is demonstrated and secured.

- **Affordable housing.** A 50% contribution is stated. §9.1 then explains that, because 67 is an odd number, an exact 50% whole-unit split cannot be expressed, and that a delivery mechanism and any balancing mechanism are to be agreed. No unit numbers, no tenure split, no size mix, no local connection or cascade provisions and no draft heads of terms are before the Council. The Statement is explicit that it does not prejudice that negotiation. The commitment is to a percentage in the abstract, not to a schedule of affordable homes.
- **Necessary infrastructure.** No section 106 agreement has been drafted. The heads of terms at §21.2 are expressed throughout as contingent. The applicant additionally argues at §20.1 that the pre-application leisure contribution of approximately £125,193 should not be carried forward and should be recalculated. The Council is asked to give significant positive weight to an infrastructure package whose only firm content is an argument for paying less.
- **Accessible green space.** §20.1 confirms the open space and play quantum has not been assessed against applicable standards.
- **Landscape and nature recovery.** Dependent on off-site biodiversity units that have not been purchased and a landscape strategy that has not been assessed.

Paragraph 158 weight should not be given to commitments that presently exist only as intentions. If the Council is minded to approve, none of these matters should be left to post-decision negotiation.

12. The quality and reliability of the applicant's evidence

The Council is entitled to consider whether the technical evidence before it has been prepared with appropriate care. Each of the following is verifiable from the submitted documents.

- **The Flood Risk Assessment's conclusion describes the wrong development.** Its concluding section states that the consultants were requested to provide the assessment for the benefit of *commercial* development at Woodlands Farm. The introduction to the same document refers to residential development of up to 67 homes. This indicates a template that has not been checked.
- **The Planning Statement contradicts the Flood Risk Assessment** on the drainage hierarchy (section 7.2 above).
- **The Planning Statement contradicts the Lead Local Flood Authority** on whether a surface water drainage strategy has been submitted at all.
- **Inconsistent site references.** The BNG assessment gives approximately 3.4ha at grid reference TQ 63474 62203. The FRA gives 563478/162215 in its introduction and 563478/162205 on its Environment Agency

flood map extract.

- **Traffic figures are reported to three decimal places.** AM peak arrivals of 10.519 and departures of 39.396; PM peak figures of 38.123 and 21.038. Vehicle movements are discrete events. Unrounded model output presented as findings suggests the outputs have not been reviewed before submission.
- **Favourable figures are promoted; their qualifications are not.** The 28.65% biodiversity gain (hedgerow units only), the 230 trees (82 of which do not count), and the nine-space parking surplus (against an unagreed category) all appear in the Executive Summary. The qualifications appear in the body text.
- **The density figure is gross.** The claimed 19.7 dwellings per hectare is calculated across the whole 3.4ha site including open space, SuDS basins, landscape buffers and retained vegetation. §5.2 confirms a net density can only be established at reserved matters. The characterisation of the scheme as low-density and landscape-led should be treated with corresponding caution.

Individually these are minor. Cumulatively they indicate a submission assembled at pace in which templates have not been adapted, figures have not been reconciled across disciplines, and the summary does not fairly represent the underlying evidence. The Council should weigh the applicant's technical conclusions accordingly, particularly where those conclusions are advanced as reasons why no objection should be raised.

13. Request for deferral pending the Norwood Lane decision

The called-in application at Land West of Norwood Lane, Meopham will be heard at inquiry from 13 October 2026. It raises the same central questions as this application: whether Green Belt land on the edge of a Meopham settlement qualifies as grey belt, whether NPPF paragraph 155 is satisfied, and whether such a location is sustainable in the terms required by paragraph 155(c). It concerns land in the same parish, in the same landscape character area, served by the same road network.

The determination deadline for this application is 12 November 2026.

If the Council determines this application before the Secretary of State has issued a decision on Norwood Lane, it will do so without the benefit of an authoritative determination of the very policy questions on which this application turns — a determination which, on the current timetable, may follow only weeks later.

I ask that the Council seeks an extension of time with the applicant and defers determination until the Norwood Lane decision has been issued. That course is plainly in the Council's interest. A decision taken now risks being inconsistent with a Secretary of State decision issued shortly afterwards, and if this application were refused and appealed, the Norwood Lane decision would in any event be a material consideration at that appeal.

14. Planning balance

I do not dispute that Gravesham's housing land supply position is poor. The Five-Year Land Supply Statement of July 2026 records 2.53 years of supply against a requirement of 4,056 dwellings including the 20% buffer, a shortfall of 2,003 dwellings, and a Housing Delivery Test result of 59%. The delivery of 67 homes carries real weight and I do not suggest otherwise.

But a housing shortfall is not a planning permission. It does not make an unsuitable site suitable, and it is not a substitute for the plan-led approach. The emerging Local Plan 2042 reached Regulation 19 Proposed Submission on 17 April 2026 and is the proper forum for determining where growth should go.

The correct decision-making sequence is this. If paragraph 155 is not satisfied — and on the present evidence it cannot be, because the grey belt gateway is untested for want of an LVIA and criteria (a) and (c) are unevidenced — then this is inappropriate development in the Green Belt. Green Belt is a footnote 7 designation. The tilted balance in paragraph 11(d) is disapplied. Substantial weight attaches to Green Belt harm, and Very Special Circumstances must be demonstrated.

Against 67 homes and an affordable housing percentage not yet secured in any enforceable form, the Council must weigh:

- Green Belt harm which its own Stage 2 evidence rates as high, on a parcel making a significant contribution to protecting the countryside from encroachment
- Landscape harm which has not been assessed at all
- Potential harm to the setting of the Kent Downs National Landscape which Natural England has expressly declined to rule out, engaging the section 245 duty
- A 29.82% net loss of on-site area habitat, with the offset unpurchased and unregistered
- Loss of important hedgerows of an extent the Council does not yet know
- A near-fourfold increase in peak traffic on an unlit single-track lane with no footway, unaudited and unapproved by the highway authority
- Deep bore infiltration into chalk within a Source Protection Zone on assumed rates, with road and parking runoff unassessed
- Inadequate foul network capacity with an acknowledged increased risk of foul flooding
- Potential loss of best and most versatile agricultural land, unquantified
- Demolition of a potential non-designated heritage asset the Council has never assessed
- An Archaeological Notification Area of which 47% remains uninvestigated
- Cumulative effects alongside three other major schemes, entirely unassessed

Even were the tilted balance engaged, these adverse impacts would significantly and demonstrably outweigh the benefits. On the correct Green Belt test, the case is not close.

15. Conclusion and requests

I ask that application 20260815 be refused.

In the alternative, if the Council is minded to continue processing the application, I ask that it:

- Defers determination until the Norwood Lane decision is issued (section 13 above)
- Does not determine the application until the Lead Local Flood Authority has received and reviewed a complete surface water drainage strategy, as it has expressly requested
- Requires a Landscape and Visual Impact Assessment prepared in accordance with GLVIA3, including assessment of effects on the setting and special qualities of the Kent Downs National Landscape, and re-consults upon it
- Consults the Kent Downs National Landscape Partnership, as Natural England recommends
- Consults the Environment Agency on deep bore infiltration within Groundwater Source Protection Zone 3
- Requires a site-specific Agricultural Land Classification survey
- Requires its Conservation Officer to assess Woodlands Farm as a potential non-designated heritage asset and to carry out and record the NPPF paragraph 209 balanced judgement

- Obtains KCC Archaeology's substantive view on the unsurveyed area of the site
- Requires a site-specific Green Belt assessment reconciled against the Council's Stage 2 evidence for this parcel
- Requires the coordinated Ecological Impact Assessment reconciling hedgerow retention and removal, and the biodiversity metric re-run applying the strategic significance indicated by the Local Nature Recovery Strategy
- Requires a cumulative highway and infrastructure assessment taking account of Norwood Lane, Blackthorn Farm and Rose Farm
- Re-consults on all of the above, the material being new and substantial

Finally, I renew my request that this application be determined by **Planning Committee** rather than under delegated powers, given the volume of public objection, the Green Belt issues engaged and the number of statutory consultee concerns outstanding.

