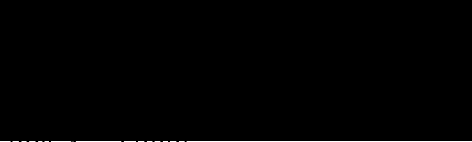


Luddesdown Parish Council

Email: clerk@luddesdown-pc.gov.uk Website: www.luddesdown-pc.gov.uk



Luddesdown Parish Council



29th April 2025

Planning Department

Gravesham Borough Council
Civic Centre
Windmill Street
Gravesend
Kent DA12 1AU

BY EMAIL

planning@gravesham.gov.uk

**Subject: Environmental Impact Assessment Screening Request – Cobham House Winery
(Application 20240544, DA12 3AA)**

Dear GBC Planning Team,

Luddesdown Parish Council (LPC) writes to express its formal concern regarding the proposed winery development at Cobham House, Gold Street, situated within the Kent Downs National Landscape (formerly AONB). LPC urge the Council to conduct an Environmental Impact Assessment (EIA) screening under **Regulation 6** of the **Town and Country Planning (Environmental Impact Assessment) Regulations 2017**, if this has not already occurred, or to revisit any existing screening in light of recent evidence and submissions.

Given the site's location in a nationally protected landscape, and the breadth of environmental issues raised, it is difficult to understand why such a screening has not already taken place. LPC believe the failure to initiate this process earlier has contributed to the confusion, contention, and procedural delays surrounding this application since 2024. This matter should now be rectified as a matter of urgency.

LPC are aware of and share many of the concerns raised by our neighbouring parish council and residents in the area. These include not only the overall environmental footprint of the scheme but also growing doubts about the adequacy of supporting assessments. Notably, LPC have seen footage and first-hand evidence indicating that the site is not suitable for large-vehicle access. In our view, the current **KCC Highways assessment is flawed**, and LPC believe the Council must take steps to revisit that assessment and ensure it reflects operational reality.

Why an EIA is Required

This development clearly engages multiple triggers under Schedule 2 of the EIA Regulations:

The internal floor area exceeds **1,000 m²**, placing it under **Schedule 2, Category 7** for food industry installations.

The site is located in a **National Landscape**, a legally protected and environmentally sensitive designation.

There are **substantial concerns** about traffic, odour, wastewater, lighting, biodiversity, and noise — as documented in expert reports and community submissions.

Over **400 formal objections** and significant local participation (700+ residents) reflect the depth and credibility of these concerns.

LPC are concerned that the Council has not yet discharged its duty under **Section 85 of the Countryside and Rights of Way Act 2000**, which requires all public bodies to have regard to conserving and enhancing the natural beauty of designated landscapes in decision-making

Specific Areas of Concern

LPC highlight the following issues as warranting formal environmental assessment:

Odour and Wastewater: No clear mitigation strategy for the disposal of up to 1.35 million litres of winery effluent. Fermentation by-products pose odour and contamination risks.

Landscape and Visual Impact: Elevated and unshielded site, visible from public vantage points including PROW NS190. The development undermines the area's tranquillity, dark skies, and rural character.

Lighting: No strategy submitted for vehicle or security lighting and parking locations despite its classification as an E1 dark sky zone. This is a notable omission.

Biodiversity: Evidence of protected species including badgers, bats, and owls. No ecological survey provided.

Noise: Independent analysis shows serious underestimation of bottling-line and equipment noise, with no reference to BS 4142 or cumulative impacts on tranquillity.

Traffic and Access: HGV access remains unresolved. Survey responses and footage (<https://youtu.be/radyg6coLXE?feature=shared>) confirm that the site cannot be accessed safely and accommodate large vehicles without risk to highways or PROWs. The KCC desktop assessment fails to reflect this and is clearly a case of administrative error.

Procedural Gaps: No public explanation has been given as to why EIA screening was not initiated earlier. The lack of clarity is contributing to procedural ambiguity and public distrust.

Our Requests

In light of these factors, Luddesdown Parish Council respectfully asks the Council to:

1. Confirm whether a screening opinion has been issued for Application 20240544
2. If not, issue one now under **Regulation 6 of the EIA Regulations 2017**;
3. If a screening has been issued, publish it and confirm whether **Section 85** of the CROW Act was considered in that process;

4. Reconsider the validity of the highways assessment and its implications for environmental effects.

LPC remain committed to supporting lawful, appropriate development in our shared rural area. But where a proposal of this scale and sensitivity is progressing without full environmental assessment, LPC believe it is essential that the Council act decisively and transparently in the public interest.

Yours sincerely,

Peter Crow

Chair, Luddesdown Parish Council

On behalf of the Parish Council and our community