



Thursday 17th October 2024

Dear Rubin,

Many thanks for the various documents you sent me which I have now read. You state that the issues upon which you seek my experience are:

- Visual
- Noise
- Smell
- Traffic to and from the site and impacts upon the Public Rights of Way and the locality

I have therefore addressed these to start with. I have taken the view that an owner of the land is entitled to grow whatever crops they are legally allowed to grow and under current legislation are able to put up buildings to process that crop, subject to siting, design and external appearance, amongst other constraints, including those applicable to an area with the 'National Landscape' designation. It happens that I am familiar with Gravesend, having worked there in my earlier career, and have visited nearby Luddesdown on viticultural business.

My view is that the application greatly understates the eventual size and scope of the operation and there is no agricultural imperative that it must be sited where it's proposed. Without a full planning application that allows proper calculations on the operational impacts of the development, the true traffic implications, and the wastewater treatment plans, then the real scale of it cannot be known to the planning system.

Regards,



Re: Winery at Cobham House Vineyard

Sole Street, Cobham, Kent, DA12 3AA

1. Winery

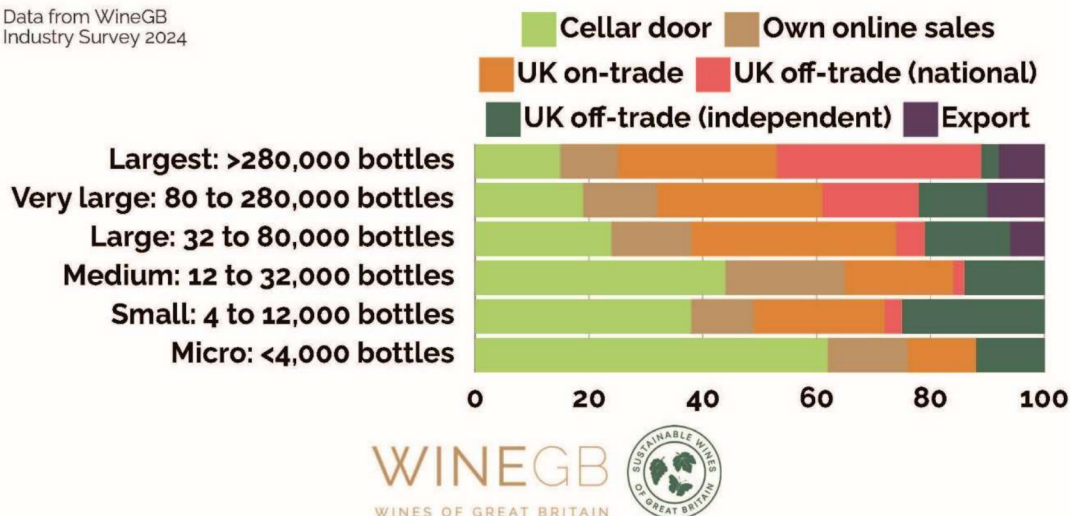
- a. The current planning application is to determine whether the proposed winery can be built under Permitted Development (PD).
- b. Agricultural buildings are allowed under PD up to 1,000 sq.m. in size and only for certain purposes. These include, in the case of vineyards:
 - i. Making and selling wine produced from grapes grown on land attached to the winery.
 - ii. Sales can be direct to visitors to the site, on-line using delivery drivers, and to on-trade and off-trade customers to whom the wine would typically be collected from the winery by a haulier.
 - iii. Many vineyards offer visits and tours of the vineyard and winery, including tastings, but whether this is permitted under wineries erected under PD is unclear. Some claim that if it is limited to only 28 days in a year, then it is acceptable, but this would be difficult for planners to monitor.
 - iv. Similarly, some wineries offer their premises for weddings and other functions using temporary marquees. These events can attract significant numbers of guests, in addition to catering, and music.
- c. The above additional pursuits would increase the footfall and traffic movements to and from the site.
- d. Permitted Development does not include other activities which many wineries in GB undertake, namely:
 - i. The making and selling of wine produced from grapes either grown by the applicant on land that they own elsewhere, grown on land they rent or lease elsewhere, or from grapes that they obtain from another grower (typically a contract grower).
 - ii. Contract winemaking for owners of vineyards without their own wineries who bring their grapes to be processed into wine and bottled.
 - iii. The provision of meals to visitors.
 - iv. The selling of ancillary products not produced on the holding,

2. Size of winery

- a. Using categories adopted by WineGB, the winegrowing industry's membership organisation which based on the number of bottles produced, the size of the winery is 'large'. As discussed later, harvest yields are highly volatile, and in years with high yields, the greater quantity of number of bottles produced would put it in the 'very large' category. See infographic below.

Sales channel split by producer size:

Data from WineGB
Industry Survey 2024



- b. The Vinescapes 'Executive Summary' (p.6) estimates that a total of 890 sq.m. are required for the current proposed production of ca. 60,000 x 75 cl bottles a year. The plans for the winery show that approximately 2/3rds of this space is above ground and 1/3 in a semi-underground ageing cellar for bottled stock.
- c. Page 2 of the 'Executive Summary' states that it is proposed to produce five different types of sparkling wine and one still wine, a rosé. It also states that the sparkling wines are to be aged between 3.5 and 5 years before sale.
- d. Page 2 also states that annual volumes in GB can vary and gives the figures as plus or minus 50 per cent, i.e. in this vineyard, if you accept these figures, the annual yield could be between 30,000 bottles and 90,000 bottles.
- e. In fact, we know the variability of yields in the UK is much greater than this with a difference between the lowest yielding year in the last twelve years (2012) and the two highest years (2018 and 2023) of a factor of 7.5. There are also regional variations - Kent being the highest yielding region, and then wide variations between the top 25% and bottom 25% of vineyards.
- f. In the case of this vineyard, the maximum yield per year might easily rise to 150,000 bottles or more, which would be classed as 'very large'. As time has gone on, yields have increased, decade on decade. The WineGB 'Harvest Report' says that based upon the current trend, yields per hectare could increase by at least 1/3 in the next 10 years.
- g. The amount of stock required is a theoretical amount based upon the predicted yield, the ageing time deemed right for the wine in question, and the rate of sale. In other words, highly unpredictable and most wineries underestimate the space they need for bottled stock.
- h. Space required for wine kept in storage crates (typically approx. 500 bottles per crate) needs to be calculated based upon the number of different wines to

be stored, and the number of different vintages. The first wines to be stored are usually the first to be required for sale i.e. the oldest, and they need to be accessible without having to move all the younger stock. This takes up space.

- i. Taking the yields and ageing times above, noting that there are 6 separate wines to store, and allowing space for pallet trucks and forklifts to access the crates, I do not believe that enough storage space has been allowed for bottled stock.
- j. It is also my experience that most producers underestimate the working and storage space they require for their wineries and such things as dry goods, packaging materials, picking containers, empty crates and pallets, all require much more storage space than most realise.
- k. The plans show a space for one 4,000 kg press, but not the 8,000 kg 'Coquard' press which is included in the list of winery equipment shown in the Vinescapes report. The report also talks about a 'covered receivable area' but this is not shown on the plans.
- l. The area allowed for the 'tractor and vineyard equipment' both inside the winery (around 45 m²) and external hard standing is clearly inadequate for the scale of the operation being proposed. A vineyard of this size (12-ha) would need at least two tractors, plus the basic vineyard equipment of pesticide sprayer, weed sprayer and/or undervine hoe, mower, trailers, leaf trimmer, de-leafers and other ancillary equipment. These are all valuable items which need housing in dry, secure storage buildings. Most vineyards would also have a small workshop area for running-repairs and servicing.
- m. A winery of the right size for the vineyards proposed would be in excess of the 1,000 sq.m. allowed under PD.

3. Visual

- a. The winery is badly sited being prominent in a valley and village boundary setting, and to the detriment of local residents with regard to commercial activity, noise and traffic movements. There is no agricultural or winemaking need for the winery to be built where it is proposed and a previous application has already been submitted at an alternative location.
- b. The internal access from the existing field gate via a considerably long internal track to the winery building, where it is badly sited next to residential properties, is without agricultural purpose and increases the impact of traffic and disturbance.
- c. As the area is highly regarded for its unspoilt natural beauty, the applicant could do more to shield the site, wherever it is sited. Arrivals and departures from customers, suppliers and employees will become noticeable in a tranquil rural area. More could also be done with earth berms and with tree planting to shield the winery wherever it is sited. Given that some underground storage is proposed, this could be extended to provide more storage space, without expending the footprint of the building.

- d. This is especially in relation to noise from compressors and condensers which, if badly sited, can be heard from some distance. Many winery machines need compressed air or compressed coolant, and their compressors and condensers are always sited outside in order to dissipate the heat they produce. They should be housed in sound-proofed areas.

4. Operational Activities

- a. Given the size of the vineyards, the harvest period might last up to 6 weeks, and grapes will arrive by tractor and trailer on small loads as they are harvested and pressed batch by batch.
- b. During harvest there will be more noise than normal (in terms of a new building on a previously undeveloped site) and there will be tractors and trailers arriving and unloading and presses working. Grape presses are mainly silent, except for the release of compressed air, or noise from staff when the presses are being loaded, unloaded and cleaned down which often takes place outside.
- c. Given that there are two presses, with a filled capacity (whole bunch pressed) of 6 tonnes, the total harvest is likely to be around 60 to 100 tonnes in an average year and working hours can run from, say, 8 am to 10 pm in the evening.
- d. Bottling will depend on the harvest yield, and as stated earlier, could rise to 150,000 bottles or more, and these figures are expected to continue to grow for some time due to improvements in techniques, skills, climate and other factors. The figures used in the application are based on a yield which is lower than the average for the whole country, even though Kent is consistently one of the highest producing regions.

5. Smell

- a. Wine making is water intensive and 'process water' includes not only water used inside the winery for washing tanks and equipment and for washing down floors, but also water used outside to wash down tractors and equipment, picking bins and trailers, wine presses and hardstanding.
- b. Process water is required by law to be correctly treated, and it is not permitted for it to drain into the mains drainage, onto adjacent farmland or into a soak-away.
- c. There are various different ways to treat process water, one of which is to put it through a series of what are known as 'reedbeds' which over time allow the water to clean itself through a series of interlinked ponds. These have been known to smell at certain times of the year.
- d. Wastewater can also be removed using waste-removal tanker trucks and whilst this operation is occasional, it is yet another commercial traffic movement.
- e. How process water is to be treated should be part of the application whether via PD or, ideally, a full planning application.

6. Traffic to and from the site

- a. The situation with regards to traffic definitely needs to be examined and clarified. The report from 'Transport Dynamics' particularly agrees on this point. Any report must take account of exactly what could potentially take place in and from the winery, especially in relation to such things as sales and public visits.
- b. The majority of traffic at wineries is from the public buying wine, online sales, or visitors taking tours and tastings. Based on a WineGB 2024 survey, a large/very large winery like this might generate 24% of its sales from the 'cellar door' (customers arriving and leaving in cars), and an additional 14% from online sales that are collected and taken away using delivery/courier type vans. In short, 38% of bottles produced by this large/very large winery would have traffic and other impacts that come with it, over and above bulk sales.
- c. Where members of the public attend then a suitable number of car parking spaces with access are needed. Parking for visitors should be part of the planning application.
- d. There will also be deliveries of dry goods, especially around bottling time. Supplies such as bottles typically arrive on 32-ton articulated lorries, require fork-lifts to unload them, and proper concrete hardstanding to accommodate them.
- e. The roads around the site are narrow and not suited to full-size HGV's and their use would result in damaged verges, verges used as ad hoc passing places and damage to resident's gateways and entrances. The use of small lorries is possible but increases costs.
- f. Where public rights of way affected, it is not unreasonable to understand the actual level of traffic that will cross them or be felt because in a very large winery it will. At the moment, there is no information on this at all, which for a designated area is quite surprising.