

Comments summary

Dear Sir/Madam,

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

Comments were submitted at 17/02/2026 1:31 PM from [REDACTED]

Application Summary

Address:	Land At Rose Farm Downs Road Istead Rise Gravesend Kent
Proposal:	Outline planning application for the demolition of 64 Downs Road and erection of up to 154No. residential dwellings (including affordable housing), with all matters reserved except for access. Creation of a new access from Downs Road.
Case Officer:	Adeoye Lawal

[Click for further information](#)

Customer Details

Name:	[REDACTED]
Email:	[REDACTED]
Address:	[REDACTED] he old yews New barn

Comments Details

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

Reasons for comment:

Comments:	I object on the grounds that it represents a clear and unjustified encroachment into designated Green Belt land. The purpose of the Green Belt is to prevent urban sprawl and protect the openness and character of the countryside. Approval of this development would undermine that fundamental purpose. Granting permission would also create a harmful precedent. Once development of this scale is permitted on protected land, it becomes increasingly difficult to resist further applications on adjoining sites. Incremental erosion of the Green Belt fundamentally changes settlement boundaries and weakens long-standing planning protections. Given the availability of brownfield opportunities within Gravesend, releasing this Green Belt land is premature and unnecessary. Approval would signal that Green Belt protections can be overridden without truly exceptional circumstances. For these reasons, the proposal conflicts with national planning policy and should be refused. Furthermore, I object to the proposal on sustainability and climate grounds. Developing greenfield/Green Belt land results in the loss of natural carbon-absorbing soils, vegetation, and habitat. Construction of 154 dwellings will also generate significant embodied carbon emissions. In addition, the site is poorly served by public transport, meaning future residents will be heavily reliant on private vehicles, increasing traffic-related emissions.
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This approach conflicts with national objectives to reduce greenhouse gas emissions and promote sustainable patterns of development. Housing should be located where sustainable transport options are available and where existing infrastructure can support growth. Approving car-dependent development on protected countryside land is inconsistent with climate resilience principles and sustainable planning objectives.

Additionally, I object on the basis that insufficient detail has been provided regarding construction management.

The proximity of the site to a primary school and nursery makes construction impacts particularly serious. There is inadequate clarity regarding:

- Construction traffic routing
- Timing restrictions to avoid school hours
- Dust suppression measures
- Noise mitigation
- Wheel washing and road cleaning
- Safe pedestrian segregation during works

Without a detailed and enforceable Construction Environmental Management Plan, there is unacceptable risk to children, parents, staff, and nearby residents. Given the vulnerability of infants and young children, the burden of proof must be high. The absence of clear safeguards is grounds for refusal.

I also object due to the likely increase in artificial lighting associated with this development. Street lighting, security lighting, and vehicle headlights will permanently alter the currently dark Green Belt environment. Artificial light is known to disrupt bat foraging and commuting routes. All bat species are legally protected in the UK, and planning authorities must consider impacts on protected species. The loss of dark corridors and natural habitat could result in disturbance or displacement of bat populations using the site. This would conflict with biodiversity protection duties and wildlife legislation. In the absence of comprehensive ecological surveys and a robust lighting strategy demonstrating no harm to protected species, the application should not be approved.

Another reason I object to the proposed development is based on flood risk and drainage grounds. The site currently consists of permeable Green Belt land which naturally absorbs rainfall and reduces surface water runoff. Replacing this with housing, roads, hardstanding and impermeable surfaces will significantly increase runoff volumes. Even where sustainable drainage systems (SuDS) are proposed, these systems can fail, require ongoing maintenance, and may not replicate the natural absorption capacity of undeveloped land. Increased runoff risks exacerbating localised flooding both on-site and in surrounding residential areas.

Climate change is increasing the frequency and intensity of extreme rainfall events. Development that removes natural drainage capacity conflicts with national policy requiring planning decisions to reduce flood risk and improve climate resilience. Until it can be clearly demonstrated that flood risk will not increase elsewhere, the proposal should be refused.

Lastly, I object on the basis that the cumulative impact of this development has not been adequately assessed. When considered alongside existing housing growth in Gravesend, the addition of 154 dwellings will significantly increase demand for:

- GP surgeries
- Hospital services
- Schoolplaces
- Nursery and childcare provision
- Water supply and sewerage capacity

-Road network capacity

Planning decisions must consider cumulative impact, not just isolated effects.
The combined pressure on local services is unsustainable and contrary to the
objective of achieving balanced, infrastructure-led growth

Kind regards