

Comments summary

Dear Sir/Madam,

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

Comments were submitted at 25/01/2026 1:35 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] Downs Road Istead Rise

Comments Details

Commenter Type:	Neighbour
Stance:	Customer objects to the Planning Application

Reasons for comment:

Comments:

1 - Green Belt Conflict: The site lies within the Green Belt and outside the defined village boundary. National and local planning policies (NPPF §153; Gravesham CS02) restrict such development unless exceptional circumstances are demonstrated. This proposal does not meet that threshold and undermines the plan-led approach.

2-Loss of Openness and Countryside: The development would result in the permanent loss of 9.6 hectares of open land, contributing to urban sprawl and diminishing the separation between Istead Rise and New Barn. The site plays a role in safeguarding the countryside, and its development would erode the openness that Green Belt policy seeks to protect.

3-Traffic and Road Safety: The proposed homes would significantly increase vehicle movements, adding pressure to Downs Road and nearby junctions. This raises concerns about congestion, pedestrian safety-especially near the primary school-and the lack of robust public transport options. NPPF §110/§111 require that developments do not compromise highway safety or cause severe traffic impacts.

4-Infrastructure Pressure: The local school, GP surgery, and other services are already under strain. The influx of new residents would exacerbate this, with no clear evidence that Section 106 contributions will fully address the increased

demand. Gravesham CS10 requires infrastructure to be in place to support new development.

5-Visual and Landscape Impact: The development would alter the rural character of the area, replacing open fields with dense housing. The developer's own assessment acknowledges significant adverse effects on the landscape. This is contrary to CS19 and NPPF §130, which seek to protect local character and visual amenity.

6-Residential Amenity: The proximity of new two-storey homes to existing properties raises concerns about overlooking, loss of privacy, and increased noise. These impacts are contrary to NPPF §130(f) and Gravesham's Residential Layout Guidelines.

7-Environmental Concerns: The site supports wildlife and mature trees. The development would result in habitat loss and biodiversity decline. While a 10% Biodiversity Net Gain is proposed, this is the minimum requirement and may not offset the immediate ecological damage. CS18 and NPPF §180 stress the importance of protecting and enhancing biodiversity.

8-Drainage and Flooding: The site's topography increases the risk of surface water runoff affecting Downs Road. The proposed drainage strategy must be proven effective and sustainable. Additionally, the capacity of the foul water system is uncertain. NPPF §167 requires developments to avoid increasing flood risk elsewhere.

9-Heritage Impact: Downs Hall, a Grade II listed building, lies close to the site. The development would harm its setting and historic context. NPPF §202 requires that any harm to heritage assets be clearly outweighed by public benefits, which is not the case here.

10-Lack of Justification: The applicant's reliance on housing need and affordable housing does not override Green Belt protections. The "Grey Belt" concept is not formally adopted in local policy. The claimed benefits do not outweigh the cumulative harm.

11-Agricultural Land Loss: The site comprises farmland that may be classified as best and most versatile. Its loss would conflict with NPPF §174-175, which seek to protect such land. Even if not BMV, the loss of productive land undermines sustainability and food security.

For these reasons, I respectfully request that the application be refused.

Kind regards