

Comments summary

Dear Sir/Madam,

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

Comments were submitted at 12/01/2026 11:24 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]

Comments Details

Commenter Type:	Member of the Public
Stance:	Customer objects to the Planning Application
Reasons for comment:	
Comments:	Planning Objection: Green Belt Harm, Infrastructure Deficiency, and Environmental Impact

1. Conflict with Green Belt Purposes and Local Plan Policies

The proposed development fundamentally undermines the purposes of the Green Belt, even if the land is described as "grey belt." The National Planning Policy Framework (NPPF) confirms that Green Belt land exists to protect openness and prevent inappropriate development. This proposal conflicts with those purposes by:

Contributing to the unrestricted sprawl of the existing built-up area.

Reducing the physical and visual separation between neighbouring towns and villages, increasing the risk of settlement coalescence.

Representing inappropriate encroachment into the countryside.

Harming the setting and character of a nearby historic town or village.

The development also fails to meet the criteria for being considered "not inappropriate" development on grey belt land. The site is not demonstrated to be

in a genuinely sustainable location, and approval would weaken the integrity and function of the wider Green Belt.

2. Insufficient Infrastructure and Services

The proposal is unsustainable due to inadequate supporting infrastructure, which is a material planning consideration.

Transport Impact: The development would significantly increase traffic on already constrained local roads. Limited public transport provision would increase car dependency, worsening congestion, safety risks, and air quality.

Social Infrastructure: Local schools, GP surgeries, and healthcare facilities lack the capacity to support the increased population. No adequate mitigation or secured provision has been demonstrated.

Drainage and Flood Risk: The site is at risk of flooding, and the proposed drainage strategy is insufficient. The development would increase surface water runoff, exacerbating flood risk on-site and in surrounding areas.

3. Design, Character, and Residential Amenity

The scale, height, density, and design of the proposed development are out of keeping with the character of the area.

The proposal would cause unacceptable harm to neighbouring residents through:

Overlooking and loss of privacy.

Overshadowing and loss of daylight and sunlight.

Overbearing and visually dominant massing.

Increased noise, light, and air pollution during and after construction.

4. Environmental and Ecological Harm

Despite its classification as grey belt, the site retains environmental value.

The development would result in the loss of habitats, mature trees, and hedgerows, contrary to NPPF objectives for biodiversity protection and enhancement.

The site is contaminated or potentially contaminated, and the proposed mitigation measures are insufficient to demonstrate that risks to human health and the environment can be safely managed.

The proposal threatens irreplaceable habitats, including ancient woodland and/or veteran trees, which are afforded strong protection under national planning policy.

Conclusion

For the reasons set out above, the proposed development conflicts with Green Belt purposes, fails to demonstrate sustainability, and would cause significant harm to infrastructure capacity, residential amenity, environmental assets, and local character. The application should therefore be refused.

