

# 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 9:08 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                                                                                                                                                                                                                               |

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## Customer Details

|          |                                     |
|----------|-------------------------------------|
| Name:    | [REDACTED]                          |
| Email:   | [REDACTED]                          |
| Address: | [REDACTED] Flowerhill way Gravesend |

## Comments Details

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

Reasons for comment:

Comments:

1) Inappropriate Green Belt Development: The site lies entirely within the Green Belt and outside the defined village boundary. National and local policies (NPPF §153; Gravesham CS02) restrict such development unless very special circumstances exist. This proposal represents a significant departure from the adopted Development Plan and lacks sufficient justification.

2) Harm to Green Belt Openness: The development would urbanise 9.6 ha of open countryside, undermining Green Belt purposes (NPPF §137-138), particularly safeguarding the countryside from encroachment. The developer's own evidence shows the land contributes to countryside protection. Claims of "Grey Belt" status are disputed and not formally recognised in the local plan.

3) Traffic & Highway Safety: 154 homes could generate ~730 daily vehicle trips, increasing congestion and safety risks on Downs Road and surrounding routes, especially near Istead Rise Primary School. NPPF §110/§111 require safe access and no severe traffic impacts. Local roads already face pressure, and public transport is limited, with poor evening and weekend service.

4) Strain on Infrastructure: An estimated 370 new residents would increase demand on schools, GP services, and utilities. Gravesham CS10 requires adequate infrastructure provision. No firm commitments exist to ensure mitigation. Local services are already stretched, with residents reporting long GP

and dental waiting times and limited school places.

5) Landscape & Visual Harm: The developer's LVIA finds "Major Adverse" landscape effects at Year 1, with only moderate improvement after 15 years. The development would erode the rural character and views, contrary to CS19 and NPPF §130. The site currently serves as a green buffer and visual amenity for residents and walkers.

6) Loss of Privacy & Amenity: New two-storey homes near existing properties (e.g., Downs Road, Longwalk) risk overlooking, overshadowing, and noise. This conflicts with NPPF §130(f) and Gravesham SPG2, which require protection of residential amenity. Construction and long-term occupation will increase noise and reduce tranquillity.

7) Ecological Impact: The site supports protected species and mature trees. Despite proposed mitigation, the development would cause habitat loss and biodiversity decline. A 10% Biodiversity Net Gain is the legal minimum and may not offset immediate harm. CS18 and NPPF §180 emphasise environmental protection and enhancement.

8.) Flood Risk & Drainage: Though in Flood Zone 1, the sloping site could worsen surface water runoff onto Downs Road. Drainage plans rely on infiltration basins, but long-term effectiveness is uncertain. Foul water capacity is also unclear. NPPF §167 requires robust flood mitigation and assurance that flood risk will not increase elsewhere.

9) Heritage Impact: Downs Hall (Grade II) lies ~60m from the site. The development would harm its rural setting, with the developer admitting "less than substantial harm." NPPF §202 requires public benefits to outweigh such harm, which is not convincingly demonstrated. The historic character of the area would be diminished.

10) Questionable Justification: The applicant cites housing need and 50% affordable housing. However, unmet need alone does not override Green Belt protection. The "Grey Belt" concept is not adopted locally. The claimed benefits do not clearly outweigh the multiple harms. The planning balance tips against the proposal.

11) Loss of Agricultural Land: The site includes 9.6 ha of farmland. If any is "best and most versatile" (BMV), its loss would conflict with NPPF §174-175. Even if not BMV, the loss of productive land undermines food security, biodiversity, and climate goals. The land currently contributes to carbon capture, landscape character, and local resilience.

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Kind regards