

Comments summary

Dear Sir/Madam,

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

Comments were submitted at 22/01/2026 12:22 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] Fawkham Avenue Longfield

Comments Details

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

Reasons for comment:

Comments: I object to this application on the following grounds:

Green Belt Harm and Brownfield Alternatives

The site lies within the Green Belt, whose purpose is to prevent urban sprawl, safeguard the countryside, and preserve openness. The proposed development constitutes inappropriate development and would result in permanent loss of protected land. No very special circumstances have been demonstrated to justify this harm. This is particularly unjustified given the availability of multiple brownfield sites within Gravesend, which national planning policy requires to be prioritised ahead of Green Belt release.

Highway Safety, Traffic and Parking

The development would significantly increase traffic volumes, particularly during peak times that coincide with school drop-off and pick-up. The proximity of the site access to a primary school and nursery raises serious safeguarding and highway safety concerns. Increased congestion, on-street parking, reduced visibility, and vehicle movements would pose unacceptable risks to children, parents, staff, and pedestrians.

Lack of Sustainable Transport

The area is poorly served by public transport. Without adequate alternatives, new residents would be heavily reliant on private vehicles, increasing congestion, pollution, and parking pressures, contrary to sustainable development principles.

Air Quality, Dust and Noise Pollution

Construction activities would generate significant dust, posing health risks to infants attending the nursery, school children, teachers, parents, and nearby residents. Children are particularly vulnerable to airborne particulates due to developing respiratory systems. Increased traffic would also lead to long-term air and noise pollution, harming residential amenity and public health.

Mental Health, Wellbeing and Public Health Policy

The school and nursery currently benefit from being surrounded by Green Belt land, providing a calm, natural environment that supports children's mental health, wellbeing, and learning. Research (Wells & Evans, 2003) shows that access to nearby green space reduces stress in children (including those with SEND). Public Health England's Improving Access to Greenspace and the National Planning Policy Framework require planning decisions to promote healthy and safe communities and protect access to green infrastructure. This proposal conflicts with those objectives.

Pressure on Infrastructure and Local Services

Local infrastructure is already under strain. The development would place additional pressure on water supply and water pressure, sewerage systems, GP surgeries, hospitals, schools, nurseries, and pre-schools, many of which are already operating at or near capacity. There is no certainty that sufficient mitigation or expansion would be delivered to a satisfactory level.

Flood Risk

The loss of permeable Green Belt land and increased hard surfacing would increase surface water runoff and exacerbate flood risk locally, contrary to sustainable drainage and climate resilience principles. It's even referenced in the planning application that part of the proposed development would be at risk of flooding.

Wildlife, Biodiversity and Protected Bats

The Green Belt land provides habitat for wildlife, including bat species. All bats and their roosts are legally protected under the Wildlife and Countryside Act 1981 and the Conservation of Habitats and Species Regulations 2017. Gravesham Borough Council has a statutory duty under the Natural Environment and Rural Communities Act 2006 to conserve and enhance biodiversity. The proposal risks harm to bat foraging and commuting corridors and fails to adequately demonstrate that protected species would be safeguarded.

Conclusion

Given the unjustified loss of Green Belt land, availability of brownfield alternatives, unacceptable risks to child safety and health, conflict with public health policy, harm to biodiversity, increased flood risk, and severe pressure on infrastructure and services, this development is unsustainable and should be refused.

Kind regards