

Comments summary

Dear Sir/Madam,

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

Comments were submitted at 14/01/2026 5:53 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:	Neighbour
Stance:	Customer objects to the Planning Application

Reasons for comment:

Comments:

I formally object to this greenbelt development which fails to demonstrate exceptional circumstances required under the National Planning Policy Framework and contradicts Labour Government housing policy.

GREENBELT PROTECTION FAILURE
No exceptional circumstances demonstrated for greenbelt release. NPPF requires greenbelt boundaries be altered through Local Plan process, not ad-hoc applications. Sets dangerous precedent for further erosion.

BROWNFIELD-FIRST POLICY IGNORED
Gravesham has abundant brownfield sites in Gravesend requiring regeneration. Labour manifesto commits to "prioritising previously used land" and "preserving green belt." Labour only supports "grey belt" (disused car parks, wastelands) - not productive agricultural land and orchards.

Our MP Dr Lauren Sullivan supported Albion Waterside (1,500 homes on brownfield), calling it "substantial regeneration of brownfield site." Proves Gravesham can meet housing needs without destroying greenbelt.

FAILS LABOUR'S FIVE GOLDEN RULES

1. Brownfield not prioritised first
2. Genuine countryside, not "grey belt"
3. No 50% affordable housing commitment

4. No infrastructure improvements despite capacity crisis
5. Destroys green spaces rather than protecting them

INFRASTRUCTURE CAPACITY CRISIS

Healthcare: Dartford & Gravesham NHS Trust serves 500,000+ people with just 478 beds. Trust states: "local populations increasing, services undergoing expansion." A&E fails 95% target. Hospital warns: "Our A&E is very busy. Non-emergency cases may face long waiting times." Patients "wait long hours in chairs or hallways." Emergency funding required 2023. No healthcare impact assessment provided.

Education: Istead Rise Primary and local secondary schools at/near capacity. No provision for additional children.

Transport: Single access next to primary school creates hazardous junction for children. No safe walking/cycling routes - entirely car-dependent, contrary to sustainable transport policy. Dr Sullivan already raised concerns about traffic through "Meopham, Vigo and Istead Rise" from Lower Thames Crossing.

SEVERE SAFETY CONCERNS

Access point adjacent to school creates:

- Hazardous junction where children cross
- Parking overflow
- School-time congestion
- Dangerous walking/cycling conditions
- Additional traffic on congested Downs Road, A227, New Barn Road

FLOOD RISK

Downs Road in valley bottom with existing flooding. Development increases surface water runoff, exacerbating risk. No adequate assessment/mitigation.

ENVIRONMENTAL IMPACT

Destroys productive farmland, orchards, woodland, working farm. Eliminates habitats, wildlife corridors, carbon-sequestering vegetation. Increases air pollution near school. Creates urban sprawl.

NO COMMUNITY BENEFIT

No shops, public transport, healthcare, community spaces, or employment. Transforms village into car-dependent sprawl.

POLITICAL CONTRADICTION

Contradicts:

- NPPF greenbelt protection
- Labour manifesto brownfield-first commitment
- Labour's Five Golden Rules
- Our MP's brownfield support
- Our MP's Istead Rise infrastructure concerns

PRECEDENT RISK

Approval sets precedent for further greenbelt developments. Cumulative impact catastrophic.

ALTERNATIVE

Prioritise Gravesend brownfield (Albion Waterside model), protect greenbelt per Labour policy, ensure adequate infrastructure, exhaust brownfield before any grey belt consideration.

CONCLUSION

Application fails exceptional circumstances test, ignores brownfield alternatives, provides inadequate infrastructure, creates safety hazards, contradicts Labour

policy, offers no community benefit.

Strongly urge refusal to protect greenbelt, respect national/Labour policy,
maintain consistency with MP's brownfield-first priorities.

Kind regards