

## **OBJECTION TO PLANNING APPLICATION 20251233**

154 Dwellings, Land at Back of Downs Road, Istead Rise

Adeoye Lawal, Planning Officer

Gravesham Borough Council

Civic Centre, Windmill Street

Gravesend, Kent DA12 1AU

14th January 2026

### **RE: Planning Application 20251233 - 154 Dwellings, Land at Back of Downs Road, Istead Rise**

Dear Mr Lawal,

I am writing to formally object to the above planning application submitted by Esquire Developments. As a resident of Istead Rise for over ten years and Meopham resident since a child, I am deeply concerned about the devastating impact this development would have on our community, local infrastructure, and the precious greenbelt that defines our village character.

### **GREENBELT PROTECTION AND NATIONAL PLANNING POLICY**

This application seeks to develop 154 houses on designated greenbelt land, which is afforded the highest level of protection under the National Planning Policy Framework (NPPF). Greenbelt land should only be released in exceptional circumstances, and I have seen no evidence that such circumstances exist here.

The application appears to directly contradict national planning policy, which states that greenbelt boundaries should only be altered in exceptional circumstances through the Local Plan process, not through ad-hoc planning applications. This development would set a dangerous precedent, opening the floodgates for further greenbelt erosion across Istead Rise and surrounding areas.

## BROWNFIELD SITES MUST BE PRIORITISED

Gravesham has abundant brownfield sites requiring regeneration, particularly in Gravesend town centre and along the Thames waterfront. These sites should be developed first before any consideration is given to greenbelt release. Developing brownfield land would:

- Regenerate neglected areas of Gravesend
- Reduce pressure on greenbelt
- Provide better access to public transport and existing infrastructure
- Support town centre vitality
- Make more efficient use of previously developed land

It is inexcusable to concrete over productive agricultural land and natural habitats when brownfield alternatives exist within the borough that desperately need investment and regeneration.

## INADEQUATE INFRASTRUCTURE CAPACITY

Local infrastructure is already operating at maximum capacity, and this development would place unbearable additional strain on essential services:

**Healthcare:** Local GP surgeries and hospitals are already overwhelmed and struggling to accept new patients. Darent Valley Hospital, which serves Istead Rise residents, is operating under severe pressure:

- Dartford and Gravesend NHS Trust serves over 500,000 people with just 478 beds at Darent Valley Hospital
- The Trust states: "As our local populations are increasing, our services are undergoing a period of expansion"
- A&E performance regularly fails to meet the NHS 4-hour target of 95%
- The hospital's website warns: "Our A&E is very busy. Non-emergency cases may face long waiting times"
- Recent reports document patients "waiting long hours in chairs or hallways" due to capacity pressures
- Emergency funding was required in 2023 (as part of a £6 million regional allocation) to add additional bed capacity

Adding 154 homes (potentially 350+ residents) to an already overstretched healthcare system is irresponsible and dangerous. Where is the evidence that adequate healthcare provision can be secured? The developer has provided no healthcare impact assessment or mitigation plan.

**Education:** Istead Rise Primary School and local secondary schools are already at or near capacity. The application provides no convincing solution for the additional school-age children this development would generate.

**Transport and Highways:** The local road network is inadequate for this scale of development. The proposed single vehicular access point directly adjacent to Istead Rise Primary School is particularly concerning and would create a dangerous environment for children during school drop-off and pick-up times.

## SEVERE HIGHWAY SAFETY CONCERNS

The development proposes a single access point next to Istead Rise Primary School, which would create:

- A hazardous new junction where children cross daily
- Parking overflow into surrounding residential streets
- Increased traffic congestion at school times
- Dangerous conditions for walking and cycling to school
- Additional traffic on Downs Road, A227, and New Barn Road, which are already congested

There are no safe walking or cycling routes to Gravesend or Meopham, meaning this development would be entirely car-dependent, contrary to sustainable development principles and national planning policy encouraging modal shift away from private vehicles.

## SIGNIFICANT FLOOD RISK

Downs Road sits at the bottom of a valley, and residents already experience flooding issues. Developing 154 homes with associated hard surfaces and drainage would dramatically increase surface water runoff, exacerbating flood risk for existing properties. Has a comprehensive flood risk assessment been conducted? What mitigation measures are proposed, and are they adequate?

## LOSS OF AGRICULTURAL LAND AND FOOD SECURITY

This development would result in the permanent loss of fertile agricultural land currently used for food production. At a time when food security is of national importance, destroying productive farmland to build houses that could be accommodated on brownfield sites is environmentally and economically irresponsible.

## ENVIRONMENTAL AND ECOLOGICAL IMPACT

The site comprises fields, hedgerows, orchards, woodland, and a working farm - all providing valuable habitats for wildlife and protected species. The loss of this greenbelt land would:

- Destroy natural habitats and biodiversity
- Eliminate wildlife corridors
- Remove carbon-sequestering vegetation
- Increase air pollution, particularly around the school
- Cause light and noise pollution affecting existing residents
- Result in urban sprawl, closing the gap between Istead Rise and New Barn

## LACK OF COMMUNITY BENEFIT

This development offers no tangible benefits to the local community. It provides no additional:

- Shops or local services
- Public transport links
- Healthcare facilities
- Community spaces
- Employment opportunities

The development would transform Istead Rise from a village community into a car-dependent suburban sprawl, fundamentally altering its character and destroying what makes it a desirable place to live.

## INCONSISTENCY WITH MP'S POSITION AND LABOUR HOUSING POLICY

This application directly contradicts both our Labour MP Dr Lauren Sullivan's demonstrated priorities and the Labour Government's housing policy:

**Labour's National Housing Policy:** The Labour Party manifesto (2024) commits to a "brownfield first approach, prioritising the development of previously used land wherever possible" and to "preserving the green belt." Labour only supports release of lower quality 'grey belt' land (disused car parks, poor-quality wastelands) - not productive agricultural land, orchards, and woodland.

Labour's "Five Golden Rules" for any greenbelt release require:

1. Brownfield land must be prioritised first
2. Only grey belt (poor-quality wasteland) - not genuine countryside
3. 50% affordable housing delivery
4. Infrastructure improvements (schools, GP surgeries)
5. Protection and improvement of genuine green spaces

This Istead Rise application fails ALL five criteria.

**Dr Sullivan's Brownfield-First Track Record:** In 2021, as Cabinet Member for Strategic Environment at Gravesham Borough Council, Dr Sullivan supported the Albion Waterside development - regenerating 1,500 homes on a riverside brownfield site in Gravesend. She described it as "a substantial and high-quality regeneration of a brownfield site which will transform a rundown area."

Dr Sullivan has also expressed serious concerns about increased traffic through "Meopham, Vigo and Istead Rise" from the Lower Thames Crossing, demonstrating her awareness of infrastructure constraints in our area.

Given her support for brownfield regeneration and concerns about Istead Rise infrastructure, this greenbelt application contradicts her demonstrated priorities for Gravesham.

## ALTERNATIVE SOLUTION

Instead of destroying greenbelt land, Gravesham Borough Council should:

1. Prioritise brownfield site development in Gravesend (following the Albion Waterside model)
2. Invest in town centre regeneration
3. Protect and enhance greenbelt boundaries as per Labour policy
4. Ensure any future housing developments are supported by adequate infrastructure
5. Focus on sustainable, well-connected sites with existing public transport
6. Only consider grey belt land after brownfield options are exhausted

## CONCLUSION

This application fails to demonstrate the exceptional circumstances required for greenbelt release, ignores the availability of brownfield alternatives, provides inadequate infrastructure, creates serious highway safety concerns, and offers no benefit to the local community. Critically, it contradicts both Labour's national housing policy and our MP's demonstrated support for brownfield-first development.

I strongly urge Gravesham Borough Council to reject this application and protect our greenbelt for current and future generations. Our village character, natural environment, and community well-being depend on your decision.

I would welcome the opportunity to discuss my objections further and request to be notified of the planning committee meeting date should this application proceed to that stage.

