

Comments summary

Dear Sir/Madam,

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

Comments were submitted at 24/01/2026 12:00 AM 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:	Long Walk Istead Rise Kent

Comments Details

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

Reasons for comment:

Comments:	My objection is made on the basis of the following material planning considerations, with reference to the National Planning Policy Framework (NPPF) and the Gravesham Local Plan Core Strategy. 1. Inappropriate Development in the Green Belt The application site lies wholly within designated Green Belt land, extending from Istead Rise Primary School through to Long Walk. NPPF paragraphs 138, 153 and 154 make clear that new housing in the Green Belt is inappropriate development by definition, causes harm to openness, and should only be approved in Very Special Circumstances. This proposal directly conflicts with Gravesham Local Plan Core Strategy Policy CS03 (Green Belt), which seeks to: - Protect the openness and permanence of the Green Belt - Prevent urban sprawl and countryside encroachment - Ensure development within the Green Belt is strictly limited The scale and urban form of 154 dwellings would fundamentally undermine the openness and purposes of the Green Belt, contrary to Policy CS03 and NPPF paragraph 138. 2. Absence of Very Special Circumstances Policy CS03 reflects national policy in requiring that development in the Green Belt is only permitted where Very Special Circumstances clearly outweigh the harm. No such circumstances have been demonstrated. Housing need alone, particularly for executive-style housing, does not constitute Very Special
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Circumstances, especially where alternative non-Green Belt sites exist.
The proposal therefore fails the primary policy test for Green Belt development.

3. Executive Housing Does Not Meet Identified Housing Need

The proposed dwellings are clearly large, executive homes, rather than affordable or needs-based housing.

This conflicts with:

NPPF paragraph 60, which requires housing mix to reflect identified local needs
Gravesham Core Strategy Policy CS02 (Scale and Distribution of Development), which directs development to the most sustainable locations and requires it to meet the needs of the Borough

The loss of protected Green Belt land for high-value housing that does not address local need represents poor planning and conflicts with both local and national policy.

4. Unsafe Emergency and Pedestrian Access via Long Walk

The proposal relies on Long Walk as an emergency and/or pedestrian access route.

This conflicts with:

NPPF paragraphs 110 and 116, which require safe, suitable access and allow refusal where highway safety would be compromised

Gravesham Core Strategy Policy CS11 (Transport), which requires development to:

Be safely accessible

Avoid harm to highway safety

Protect the amenity and safety of existing residents

Long Walk is a narrow, dead-end residential road with no suitable footways, restricted width, and limited turning capacity. It is wholly unsuitable to function as an emergency or evacuation route for a development of this scale.

The proposal fails to demonstrate that safe access can be achieved, contrary to Policy CS11.

5. Impact on Children and School Safety

The development would significantly increase traffic along Downs Road, close to Istead Rise Primary School.

This conflicts with:

NPPF paragraph 110, which prioritises pedestrian safety

Policy CS11, which requires development to promote safe movement for all users

Increased traffic volumes and additional junctions would materially increase risk to children walking to and from school.

6. Environmental Harm and Loss of Countryside

The site currently comprises fields, hedgerows, orchard, woodland and farmland, forming part of the rural setting of Istead Rise.

The proposal conflicts with:

NPPF paragraphs 174 and 180, which seek to protect landscapes and biodiversity

Gravesham Core Strategy Policy CS07 (Green Infrastructure), which requires the protection and enhancement of natural assets, habitats and landscape character

The development would result in irreversible loss of countryside and habitat and contribute to urban sprawl and settlement coalescence.

7. Unsustainable Development and Infrastructure Deficit

The proposal fails to meet the test of sustainable development under:

NPPF paragraph 8

Gravesham Core Strategy Policy CS02

Local infrastructure is already under significant strain, including healthcare, schools, highways and public transport. The application fails to demonstrate that necessary infrastructure can be delivered to support a development of this scale in this location.

8. Surface Water Drainage and Flood Risk

The proposal fails to adequately address surface water drainage and flood risk.

The site is known to experience poor drainage, and the extent of proposed hard surfacing would significantly increase surface water run-off.

The application does not demonstrate that sustainable drainage systems (SuDS)

can be effectively delivered without increasing flood risk on-site or to neighbouring land and properties.
The proposal is therefore contrary to NPPF paragraphs 167 and 173 and Gravesham Core Strategy Policy CS18 (Flood Risk)

Kind regards