

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 9:27 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] Castlefields Istead Rise

Comments Details

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

Reasons for comment:

Comments: I formally object to this application on material planning grounds and respectfully urge REFUSAL based on the following:

1. INAPPROPRIATE GREENBELT DEVELOPMENT

Site lies entirely within Metropolitan Greenbelt beyond development limits on productive farmland. Fulfills essential purposes: preventing sprawl, preserving separation from New Barn, safeguarding countryside. Developer's "Greybelt" argument fails-December 2024 NPPF explicitly excludes agricultural land from Grey Belt. No very special circumstances demonstrated. Conflicts with NPPF Paragraphs 147-151 and Local Plan Greenbelt policies.

2. DANGEROUS HIGHWAY ACCESS

Single access via Downs Road sits immediately beside Istead Rise Primary School, creating severe child safety risks during school hours. Requires demolishing No. 64 Downs Road with no emergency alternative. School-time congestion will intensify with 300+ daily vehicle movements, directly endangering children and pedestrians. Breaches NPPF Paragraphs 115(b) and 116 requiring safe access and highway safety, plus Kent Highway standards.

3. FLOODING AND DRAINAGE CONCERNS

Downs Road occupies former riverbed with persistent standing water. Site functions as natural drainage. Developing 8-9.6 hectares with impermeable surfaces will increase runoff and flood risk to neighbours. SuDS proposals raise

maintenance, capacity, and failure concerns. Contravenes NPPF Paragraph 171 prohibiting development increasing flood risk elsewhere.

4. LOSS OF PRODUCTIVE AGRICULTURAL LAND

Permanent elimination of Grade 3 arable farmland in active food production. Post-Brexit, losing productive capacity contradicts food security objectives. December 2024 NPPF strengthens protection by excluding such land from "Grey Belt" reclassification. Violates NPPF Paragraphs 187(b) and 188 on agricultural resource conservation.

5. FUNDAMENTALLY UNSUSTAINABLE TRANSPORT

Istead Rise lacks rail (nearest Meopham 1.7 miles), has minimal buses, zero cycling infrastructure. Car-dependent location will generate 70+ AM and 76+ PM peak movements, realistically exceeding 300+ daily trips for 154 dwellings requiring minimum 231 vehicles (1.5 per household). Completely unsustainable. Breaches NPPF Paragraphs 109 and 110 on sustainable transport.

6. BIODIVERSITY AND PROTECTED SPECIES

Site supports Red List yellow wagtails, bats, adders, badgers-all legally protected. Complete habitat destruction across 8-9.6 hectares. Unclear if mandatory 10% biodiversity net gain achieved. Contravenes Environment Act 2021, Wildlife and Countryside Act 1981, NPPF Paragraph 180.

7. HEALTHCARE CAPACITY CRISIS

Istead Rise Surgery confirmed at full capacity, cannot accept new patients. Adding ~370 residents (154 dwellings × 2.4) requires GP registrations with no mitigation. Dentists similarly overstretched, most not accepting NHS patients. Gravesend alternatives at capacity. Violates NPPF Paragraphs 98 and 100 requiring adequate community infrastructure.

8. VILLAGE CHARACTER EROSION

11% housing stock increase (population 3,437) creates suburban sprawl incompatible with rural character. Loss of countryside, erosion of gap to New Barn, urbanization irreversibly harms village identity. Breaches NPPF Paragraphs 132, 135, and 187 on character and countryside.

9. AIR QUALITY DETERIORATION

Multi-year construction adjacent to primary school exposes children to dust, noise, contaminants-particularly harmful for asthma sufferers. Post-completion, 231+ vehicles increase NO₂ and particulates. Conflicts with NPPF Paragraphs 187(e) and 199 on air quality.

10. INADEQUATE EDUCATION PROVISION

Developer acknowledges 45 primary and 32 secondary pupils. Istead Rise Primary is at capacity. Proposed 1.5-form entry expansion inadequate, fails to address space, staffing, funding, secondary capacity, or timing. No local secondary school. Breaches NPPF Paragraph 100 and Education Act 1996.

11. INSUFFICIENT PARKING

Rural location requires 2-3 spaces per dwelling (308-462 total). Inadequate provision causes on-street parking, congestion, safety risks, emergency access obstruction. Conflicts with Kent Parking Standards, NPPF Paragraph 112, Manual for Streets.

12. CUMULATIVE IMPACT

Combined with existing Gravesham-wide development pressures, this overwhelms infrastructure, causes irreversible Greenbelt loss, sets dangerous precedent. Breaches NPPF Paragraph 198 on cumulative environmental impacts.

CONCLUSION

This constitutes inappropriate, unsustainable Greenbelt development causing demonstrable harm to highway safety, healthcare, education, flood risk, biodiversity, air quality, agricultural land, parking, and village character. No exceptional circumstances justify Greenbelt release. Housing need cannot outweigh extensive policy conflicts and material harms. Approval sets a dangerous Greenbelt erosion precedent.

Kind regards