

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 9:53 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] Castlefields Istead Rise Gravesend

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:

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, endangering children and pedestrians. Breaches NPPF Paragraphs 115(b) and 116 requiring safe access and highway safety.

Unsustainable Transport

Istead Rise lacks rail (nearest Meopham 1.7 miles), has minimal buses and zero cycling infrastructure. Transport options for the proposed development are completely unsustainable. Breaches NPPF Paragraphs 109 and 110.

Healthcare capacity crisis

Istead Rise Surgery at full capacity and cannot accept new patients. Adding ~370 residents (154 dwellings × 2.4) requires GP registrations with no mitigation. Dentists overstretched, most not accepting NHS patients and Gravesend alternatives at capacity. Violates NPPF Paragraphs 98 and 100. The local hospital, Darent Valley, is also over stretched and operating below national average for waiting times.

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 and NPPF Paragraph 112.

Inappropriate development of the Greenbelt

Site lies entirely within Metropolitan Greenbelt beyond development limits on productive farmland. The greenbelt serves essential purposes: preventing sprawl, preserving gap to New Barn, safeguarding countryside. The December 2024 NPPF explicitly excludes agricultural land from Grey Belt with no very special circumstances demonstrated which conflicts with NPPF Paragraphs 147-151 and Local Plan policies.

Flooding and Drainage

Downs Road is built on former riverbed with persistent standing water. The site currently provides natural drainage. Developing 8-9.6 hectares with impermeable surfaces increases runoff and flood risk to neighbours. SuDS proposals raise maintenance, capacity, and failure concerns. Contravenes NPPF Paragraph 171 prohibiting development increasing flood risk elsewhere.

Loss of 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.

Air Quality Deterioration

Multi-year construction beside primary school exposes children to dust, noise, contaminants and is harmful to all. Post-completion, realistically 231+ vehicles increase NO₂ and particulates. Conflicts with NPPF Paragraphs 187(e) and 199.

Village Character Erosion

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

Inadequate Education

Istead Rise Primary at capacity. Proposed 1.5-form entry expansion is inadequate, fails to address space, staffing, funding, secondary capacity, or timing. No local secondary school which will mean increased traffic, especially in rush hour. This Breaches NPPF Paragraph 100 and Education Act 1996.

Cumulative Impact

Combined with Gravesham-wide pressures, overwhelms infrastructure, causes irreversible Greenbelt loss, sets dangerous precedent. Breaches NPPF Paragraph 198.

This constitutes inappropriate, unsustainable Greenbelt development causing 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 policy conflicts and material harms.

Kind regards