

Comments summary

Dear Sir/Madam,

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

Comments were submitted at 20/01/2026 1:57 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:	Member of the Public
Stance:	Customer objects to the Planning Application

Reasons for comment:

Comments:	1. Conflict with National Green Belt Policy The proposed development constitutes inappropriate development within the Green Belt and is therefore, by definition, harmful. Paragraphs 137-151 of the National Planning Policy Framework (NPPF) make clear that substantial weight must be given to any harm to the Green Belt, and that inappropriate development should not be approved except in Very Special Circumstances. No such circumstances have been demonstrated in this case. The proposal would result in a permanent loss of openness and represent clear encroachment into the countryside, directly conflicting with the five stated purposes of the Green Belt, particularly safeguarding the countryside from encroachment and preserving the setting and character of settlements. 2. Lack of Very Special Circumstances The application appears to rely primarily on general housing delivery arguments and commercial viability. These factors do not constitute Very Special Circumstances, particularly where alternative non-Green Belt sites should be prioritised. The financial interests of a private developer cannot outweigh the long-term public harm caused by the loss of protected land. 3. Harm to Landscape Character and Visual Amenity The site contributes positively to the rural character and visual setting of Istead Rise, offering open views across the Kent countryside. The proposed
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development would result in urbanisation of a currently open landscape, causing significant and irreversible harm to landscape character and visual amenity, contrary to both national policy and local plan objectives to protect rural character.

4. Impact on Biodiversity and the Natural Environment

The development would result in habitat loss and fragmentation, with associated impacts on local wildlife. Paragraphs 174-180 of the NPPF require planning decisions to minimise impacts on biodiversity and provide measurable net gains. The proposal fails to demonstrate how environmental harm would be adequately avoided or compensated, particularly given the established nature of the existing habitats.

5. Unsustainable Location and Infrastructure Deficiencies

The site is poorly served by public transport and local amenities, resulting in a high reliance on private vehicles. This conflicts with sustainable development principles set out in the NPPF, which seek to reduce the need to travel and promote sustainable transport choices.

Local road infrastructure is already under strain, and the proposal would result in increased traffic volumes, including construction traffic, without adequate mitigation. Furthermore, there is insufficient local capacity in healthcare, education, and community facilities to support additional population growth, and no secured infrastructure provision to address these deficits.

6. Precedent and Cumulative Impact

Approval of this application would set an undesirable precedent for further Green Belt erosion in and around Istead Rise. The cumulative impact of such decisions would undermine the integrity of Green Belt policy and weaken public confidence in the planning system.

The proposed development is contrary to national and local planning policy, results in unacceptable harm to the Green Belt, landscape, biodiversity, and sustainability objectives, and fails to demonstrate Very Special Circumstances sufficient to outweigh that harm. The planning balance therefore weighs decisively against the proposal.

Kind regards