

Comments summary

Dear Sir/Madam,

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

Comments were submitted at 12/01/2026 5:25 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] Gravesend Kent

Comments Details

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

Reasons for comment:

Comments:	<p>Objection to Planning Application 20251233</p> <p>Land at Rose Farm, Downs Road, Istead Rise, Gravesend, Kent</p> <p>I wish to object to the above outline planning application on the following material planning grounds.</p> <p>1. Inappropriate development in the Green Belt</p> <p>The application site lies within the Metropolitan Green Belt. The proposal for up to 154 residential dwellings constitutes inappropriate development as defined by paragraph 153 of the National Planning Policy Framework (NPPF). Inappropriate development is, by definition, harmful to the Green Belt and should not be approved except in very special circumstances.</p> <p>The applicant has failed to demonstrate any very special circumstances that clearly outweigh the harm to the Green Belt and any other harm arising from the proposal. Housing need, including affordable housing, is explicitly not sufficient on its own to justify Green Belt release, as established by both national policy and appeal decisions.</p> <p>This proposal conflicts with:</p> <ul style="list-style-type: none">- NPPF paragraphs 152-156
-----------	--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------

- Gravesham Local Plan Core Strategy Policy CS02 (Development in the Green Belt)
- Policy CS19 (Green Infrastructure and Landscape Protection)

2. Loss of openness and countryside character

The development would result in a substantial loss of openness through built form, domestic curtilage, access roads, lighting and associated infrastructure. This would fundamentally alter the rural character of the area and erode the separation between settlements.

The harm to openness is permanent and irreversible, and no mitigation can compensate for the loss of undeveloped countryside. This is contrary to the stated purposes of Green Belt designation, including safeguarding the countryside from encroachment.

3. Highway impact and unsustainable access

The proposal would introduce significant additional traffic onto Downs Road and the A227 corridor. These routes already experience congestion and capacity issues, particularly at peak times. The scale of development proposed is not compatible with the existing road network.

This conflicts with:

- Gravesham Local Plan Policy CS11 (Transport)
- NPPF paragraph 115, which requires development to provide safe and suitable access for all users

The reliance on private car use is exacerbated by the lack of credible alternatives.

4. Inadequate public transport and car dependency

Public transport provision in this area is limited and infrequent. The site is not well served by sustainable transport modes, making the development inherently car dependent. This undermines national and local policy objectives aimed at reducing reliance on private vehicles.

This conflicts with:

- NPPF paragraphs 108 and 110
- Gravesham Local Plan Policy CS11

5. Pressure on local infrastructure and public services

The addition of up to 154 dwellings will place further strain on already overstretched infrastructure, including GP surgeries, schools, hospitals and emergency services. There is no robust evidence that sufficient capacity exists, or will be delivered, to meet the needs generated by the development.

The absence of secured and deliverable infrastructure mitigation renders the proposal unsustainable and premature.

6. Loss of agricultural land

The site comprises agricultural land that contributes to food production and rural character. Its loss conflicts with the core planning principle of recognising the intrinsic character and beauty of the countryside, as set out in paragraph 180 of the NPPF.

7. Outline application prevents proper assessment

As an outline application with all matters reserved except access, the proposal fails to demonstrate that the development can be delivered without unacceptable impacts on layout, density, drainage, landscape, biodiversity and residential amenity. This lack of detail prevents a full and informed assessment and weighs against the proposal.

Failure to demonstrate Very Special Circumstances

Crucially, the applicant has failed to demonstrate any very special circumstances that clearly outweigh the definitional harm to the Green Belt and the additional harms identified above.

General housing need, affordability arguments, or viability considerations are not unique to this site and do not amount to very special circumstances, either individually or cumulatively. Approving this application would undermine the integrity of the Green Belt and set a dangerous precedent for further incremental erosion.

Conclusion

The proposal represents inappropriate development in the Green Belt, results in substantial and permanent harm to openness and countryside character, places unacceptable pressure on highways and infrastructure, and conflicts with both national and local planning policy. In the absence of clearly demonstrated very special circumstances, the application should be refused.

Kind regards