

Comments summary

Dear Sir/Madam,

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

Comments were submitted at 26/01/2026 3:49 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] Fairview Gardens Gravesend

Comments Details

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

Reasons for comment:

Comments:	I wish to register a formal objection to planning application 20251233 on the grounds that the proposal fails to comply with several key national and local planning policies. These conflicts mean the development should not be approved in its current form. 1. Conflict with National Planning Policy Framework (NPPF) 1.1 Failure to Achieve Sustainable Development (NPPF Sections 2 & 8) The NPPF requires development to balance economic, social, and environmental objectives. This proposal appears to undermine this balance by: - Creating adverse environmental or amenity impacts that outweigh any claimed benefits. - Failing to demonstrate a positive contribution to the local community or infrastructure. 1.2 Poor Design Quality (NPPF Section 12 - Achieving Well-Designed Places) The NPPF states that development must be visually attractive, sympathetic to local character, and create a high standard of amenity for existing and future users. The application fails to meet these requirements because: - The scale, massing, or appearance is out of keeping with the surrounding built environment.
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- The proposal does not respect local character or reinforce a strong sense of place.
- The development results in unacceptable overlooking, overshadowing, noise, or loss of privacy for neighbouring properties.

1.3 Harm to Biodiversity (NPPF Section 15 - Conserving and Enhancing the Natural Environment)

If the proposal affects green space, trees, or wildlife habitats, it conflicts with the NPPF requirement to:

- Minimise impacts on biodiversity.
- Provide measurable Biodiversity Net Gain, now a statutory requirement.

1.4 Insufficient Transport and Parking Considerations (NPPF Section 9 - Promoting Sustainable Transport)

The NPPF requires safe and suitable access for all users. This application appears to:

- Increase traffic or parking pressure beyond acceptable levels.
- Fail to demonstrate safe access arrangements.
- Lack adequate sustainable transport measures.

2. Conflict with Gravesham Local Plan Policies

Gravesham Borough Council's Local Plan (Core Strategy 2014 and saved Local Plan First Review policies) sets out clear requirements for development. This proposal appears to conflict with several of them:

2.1 Policy CS19 - Development and Design Principles

This policy requires high-quality design that:

- Respects local character and distinctiveness.
- Protects amenity for existing residents.
- Ensures appropriate scale, height, massing, and layout.

The proposal fails to meet these standards, resulting in visual harm and unacceptable amenity impacts.

2.2 Policy CS12 - Green Infrastructure

If the development affects open space, trees, or ecological features, it conflicts with CS12, which requires:

- Protection and enhancement of green infrastructure.
- No net loss of biodiversity.

2.3 Policy CS11 - Transport

This policy requires developments to:

- Provide safe access.
- Avoid severe residual cumulative impacts on the road network.
- Include adequate parking and sustainable transport measures.

The application does not demonstrate compliance with these requirements.

2.4 Saved Policy TC1 - Design of New Developments

This long-standing policy requires new development to:

- Be well designed and respect the character of the area.
- Avoid harm to the amenity of neighbouring properties.

The proposal conflicts with these principles.

3. Insufficient Evidence and Lack of Justification

The application appears to lack adequate supporting information in several areas, such as:

- Impact assessments (traffic, noise, ecology, drainage).
- Demonstration of compliance with design guidance (e.g., Design for Gravesham SPD).
- Clear mitigation measures for identified harms.

Without this evidence, the proposal cannot be properly assessed and should not be approved.

Conclusion

For the reasons outlined above, planning application 20251233 fails to comply with key national and local planning policies, including the NPPF, Core Strategy Policies CS11, CS12, CS19, and Saved Policy TC1. The proposal would result in significant harm to local character, residential amenity, and/or the natural environment, and therefore should be refused.

Kind regards