

Comments summary

Dear Sir/Madam,

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

Comments were submitted at 19/01/2026 2:28 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

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Customer Details

Name:	[REDACTED]
Email:	[REDACTED]
Address:	Bracondale Avenue Istead Rise

Comments Details

Commenter Type:	Neighbour
Stance:	Customer objects to the Planning Application

Reasons for comment:

Comments:	I object to the outline planning application for the demolition of 64 Downs Road and the erection of up to 154 residential dwellings (access only to be considered at this stage). This objection is made in the context of the Gravesham Local Plan Core Strategy (2014), related saved policies, and the National Planning Policy Framework. 1. Transport and Highway Safety - Policy CS11 & Saved Policies T1/T5 The proposal conflicts with Policy CS11 (Transport), which requires development proposals to demonstrate sustainable transport solutions and safe, appropriate highway access, as well as minimise traffic impacts. There is no credible evidence before the Council that the local road network can accommodate the significant increase in vehicular movements arising from up to 154 dwellings without unacceptable congestion or harm to highway safety. Saved Local Plan policies T1 (impact on highway network) and T5 (new access onto highway network) also require proposals to avoid creating undue danger or traffic conflict. Current traffic conditions on Downs Road and adjacent residential streets are already strained, and the application fails to provide robust mitigation. 2. Community Infrastructure Capacity - Policy CS10 (Physical and Social Infrastructure) The application does not demonstrate the availability or secured delivery of sufficient physical and social infrastructure to support this level of housing growth. Local GP surgeries, including Istead Rise Surgery, and local schools are
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already operating at capacity, with no planned expansion or confirmed funding to meet increased demand. This lack of infrastructure provision directly undermines the Local Plan's objective of delivering sustainable development that supports healthy communities.

3. Sustainable Transport and Accessibility - Policy CS11

Policy CS11 promotes sustainable travel choices and improved access to public transport. The scheme fails to provide or require enhancements to public transport or integrated pedestrian/cycle links to local centres or transport hubs. Current bus services are insufficiently frequent, and there is no safe route to nearby mainline stations, meaning the development would be heavily car dependent and contrary to sustainable transport aims.

4. Design, Density and Local Character - Policy CS19

Under Policy CS19 (Development and Design Principles), new development should be of high quality, visually attractive, and appropriate to the character of its surroundings. This requires development to integrate with local context, preserve natural and built environment character and protect amenity. The proposed scale and density of up to 154 dwellings is excessive for this semi-rural location and lacks sufficient detail to demonstrate compliance with CS19's expectations for locally distinctive, well-integrated design.

5. Green Infrastructure, Biodiversity and Environmental Impact - Policy CS12 and CS19

Policy CS12 promotes green infrastructure, recognising its ecological, recreational and landscape value. Policy CS19 further expects new development to protect and enhance biodiversity and the Borough's green infrastructure network. The application does not adequately demonstrate how loss of countryside, green space, or biodiversity assets will be avoided, compensated, or mitigated, nor does it secure meaningful environmental enhancements.

6. Flood Risk and Drainage - Policy CS18

Policy CS18 (Climate Change) requires sequential and exception tests where flood risk is relevant and mandates adequate flood risk assessment and management. Given documented drainage and flooding issues in the area, the application's current information is insufficient to show that the development would not exacerbate flood risk locally or suffer unacceptable drainage impacts over its lifetime.

7. Cumulative Impact and Prematurity

Taken together, the unmitigated transport impacts, insufficient infrastructure provision, car dependence, loss of green space and failure to demonstrate policy compliance represent unacceptable cumulative harm. Granting permission in advance of a fully updated Local Plan, which is at an advanced stage of preparation and will better define sustainable development locations and infrastructure requirements, would be premature and risk undermining the plan-making process.

Conclusion

For the reasons set out above, and having regard to policies CS10, CS11, CS12, CS18 and CS19 of the Gravesham Local Plan Core Strategy and relevant saved transport and access policies (T1/T5), I respectfully request that this application be refused.

Kind regards