

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 2:39 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] Church Road Hartley

Comments Details

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

Reasons for comment:

Comments:	Subject: Objection to Planning Application - Land at Rose Farm, Downs Road, Istead Rise I write to formally object to the above planning application. Although presented as an outline application with access only for consideration, the proposal clearly represents the initial and enabling stage of a substantial residential development of up to 154 dwellings on land designated as Metropolitan Green Belt. The application must therefore be assessed in the context of its inevitable wider impacts and long-term consequences. My objection is based on the following material planning considerations. 1. Inappropriate Development within the Green Belt The application site lies wholly within the Metropolitan Green Belt, as designated by Gravesham Core Strategy Policy CS02. The proposed access road constitutes inappropriate development, introducing permanent, engineered infrastructure into the Green Belt. This would undermine both the openness and permanence of the designation and would facilitate further encroachment into open countryside. Paragraphs 137-151 of the National Planning Policy Framework (NPPF) make clear that inappropriate development in the Green Belt is, by definition, harmful and should not be approved except in very special circumstances. No such circumstances have been clearly, robustly, or convincingly demonstrated by the applicant. Any claimed benefits do not clearly outweigh the significant harm to the Green Belt, either individually or cumulatively. As such, the proposal conflicts with both national and local planning policy.
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2. Access Cannot Be Considered in Isolation

While access is the only matter formally submitted for determination, it is explicitly designed to serve a development of up to 154 dwellings. Its design, location, scale, and impact cannot reasonably be separated from the wider development it is intended to enable.

Approving the access at this stage would effectively establish the principle of large-scale residential development on this site, thereby prejudicing the determination of reserved matters such as layout, density, landscaping, drainage, parking provision, internal road arrangements, and construction impacts. This approach undermines meaningful public engagement and scrutiny and conflicts with Core Strategy Policy CS19, which seeks to ensure comprehensive and coordinated development.

3. Highway Safety and Traffic Impact

Downs Road already experiences congestion, capacity constraints, and safety issues, particularly during peak periods. It is used by pedestrians, cyclists, and equestrian users as well as vehicles. The introduction of a single access point serving up to 154 dwellings would result in a significant increase in vehicle movements, exacerbating existing problems and increasing the risk of conflict and accidents.

The submitted Transport Statement fails to convincingly demonstrate that the local highway network can safely accommodate this level of additional traffic. It does not adequately assess cumulative impacts arising from other committed or emerging developments in the area. This is contrary to Core Strategy Policy CS11, Local Plan Policy T1, and paragraph 115 of the NPPF, which states that development should be refused where the residual cumulative impacts on the road network would be severe.

4. Harm to Character, Openness, and Visual Amenity

The site currently plays an important role in maintaining the open, rural character of the area and forms a clear and sensitive transition between the built-up settlement of Istead Rise and the open countryside beyond. The proposed access would introduce urbanising features such as road engineering, signage, lighting, and hard surfacing, fundamentally altering the rural character of this edge-of-settlement location.

This would result in harm to visual amenity, landscape character, and the intrinsic beauty of the countryside, in conflict with Core Strategy Policies CS07 and CS12.

5. Infrastructure, Construction, and Environmental Concerns

The proposal would place additional pressure on local infrastructure, including schools, healthcare services, transport networks, and community facilities. The application provides insufficient evidence to demonstrate that existing infrastructure has the capacity to accommodate this development, contrary to Core Strategy Policy CS08.

Furthermore, the application fails to adequately address the impacts of construction activity, including construction traffic, noise, dust, vibration, and disruption to nearby residents. There is also insufficient ecological information to demonstrate that impacts on biodiversity and wildlife can be appropriately mitigated, raising concerns under Core Strategy Policy CS12 and Chapter 15 of the NPPF.

Conclusion

For the reasons set out above, I respectfully request that this planning application be refused. The proposal represents inappropriate development within the Green Belt, causes harm to openness, landscape character, and visual amenity, raises significant highway safety concerns, and seeks approval for access without sufficient information to allow a proper and informed assessment of its full impacts

Kind regards