

Comments summary

Dear Sir/Madam,

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

Comments were submitted at 18/01/2026 10:30 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] Biddenden Way Istead Rise Gravesent

Comments Details

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

Reasons for comment:

Comments:	I object to this application because it conflicts with multiple policies of the Gravesham Local Plan Core Strategies and would result in unacceptable harm to highway safety, infrastructure capacity, environmental quality, and the character of Istead Rise. Reason 1 - Unsustainable Development / Infrastructure Capacity The proposed development, by virtue of its scale and location within the small settlement of Istead Rise, would result in an unsustainable form of development. The proposal fails to demonstrate that existing or planned infrastructure, including education, healthcare, highways and utilities, has the capacity to accommodate the additional demand arising from up to 154 dwellings. As such, the development would place unacceptable pressure on local services and facilities, contrary to Policy CS02 (Sustainable Development) of the Gravesham Local Plan Core Strategy. Reason 2 - Highway Safety and Access Arrangements The proposed development relies upon a single vehicular access located in close proximity to a primary school. The increased volume of vehicular movements generated by the development, particularly during peak school drop-off and collection periods, would give rise to conditions prejudicial to highway safety and pedestrian movement. The Local Planning Authority is not satisfied that safe and suitable access can be achieved for all users. The proposal is therefore contrary to Policy CS11 (Transport) of the Gravesham Local Plan Core Strategy and the objectives of the National Planning Policy Framework. Reason 3 - Failure to Manage Travel Demand
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The site is located in an area with limited access to public transport and services (of which have been subject to further cuts and reductions), and the development would be heavily reliant on the private car. The proposal would result in an increase in vehicle trips on the local highway network and fails to adequately promote sustainable modes of travel. As such, the development is contrary to Policy CS12 (Managing Travel Demand) of the Gravesham Local Plan Core Strategy.

Reason 4 - Cumulative Traffic Impacts and Strategic Road Network Pressure

The proposal fails to adequately assess or mitigate the cumulative traffic impacts arising from existing and planned development in the wider area, including the anticipated increase in traffic associated with strategic movements between the A2 and M20 and the Lower Thames Crossing. The Local Planning Authority is not satisfied that the residual cumulative impacts on the local highway network, including increased rat-running through unsuitable rural roads, would not be severe. The proposal also presents a serious underestimation of vehicular movements. The proposal is therefore contrary to Policy CS11 (Transport) of the Gravesham Local Plan Core Strategy.

Reason 5 - Loss of Greenfield Land, Harm to Settlement Character

The proposed development would result in the loss of greenfield agricultural land on the rural edge of Istead Rise, contributing to urban sprawl and erosion of the settlement's character. The development would fail to respect the scale and form of the existing settlement and would harm the rural character of the area. The proposal is therefore contrary to Policy CS07 (Green Infrastructure) and Policy CS19 (Environmental Protection) of the Gravesham Local Plan Core Strategy, to which, in a post by the borough council on social media, regarding protecting these spaces would also demonstrate a conflicting message to its constituents.

Reason 6 - Education Capacity

Insufficient evidence has been provided to demonstrate that there is adequate capacity within local primary education provision to accommodate the additional pupil yield arising from the development, or that appropriate and deliverable mitigation would be secured. In the absence of such evidence, the proposal is contrary to Policy CS02 (Sustainable Development) of the Gravesham Local Plan Core Strategy.

Reason 7 - Health Infrastructure

The proposal fails to demonstrate that local primary healthcare services have the capacity to accommodate the additional demand generated by the development, or that appropriate mitigation measures would be secured. The resulting pressure on healthcare infrastructure would be contrary to Policy CS02 (Sustainable Development) of the Gravesham Local Plan Core Strategy. Additional evidence presented by the surgery highlights this further.

Reason 8 - Air Quality and Human Health

The increase in traffic movements associated with the development, particularly in proximity to a primary school, would result in a deterioration in local air quality, to the detriment of human health. The application fails to demonstrate that these impacts can be adequately mitigated. Concerns already voiced by KCC and GBC regarding the LTC and traffic impact resulting in an increase in pollutants have the potential to replicate those issues experienced by Dartford residents, therefore, contrary to Policy CS19 (Environmental Protection).

Kind regards