

Comments summary

Dear Sir/Madam,

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

Comments were submitted at 16/01/2026 7:07 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]

Comments Details

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

Reasons for comment:

Comments: Below is a **formal objection comment** you can submit to the Gravesham Borough planning portal for **application reference 20251233**. It is written to be robust, grounded in planning legislation and policy, and focused on public service capacity, health/environmental harm, highways safety, and procedural deficiencies.

Objection to Planning Application Ref: 20251233

I wish to formally object to the above planning application on the grounds that it is **contrary to national and local planning policy**, is based on **incomplete and inaccurate evidence**, and would result in **unacceptable harm** to public services, public health, the environment, and highway safety.

1. Failure to Comply with Planning Legislation and Policy

Under Section 38(6) of the Planning and Compulsory Purchase Act 2004, planning decisions must be made in accordance with the Development Plan unless material considerations indicate otherwise. This application fails that test.

Furthermore, the National Planning Policy Framework (NPPF) requires that development is:

- * Sustainable (paragraphs 7-11),
- * Supported by proportionate, up-to-date evidence (paragraph 31),
- * Safe and suitable with no unacceptable impacts on highway safety (paragraph 115),
- * Protective of health, wellbeing and the environment (paragraphs 92, 174-180).

The proposal does not meet these requirements.

2. Incomplete Assessments and Deferral of Critical Searches

It is of serious concern that land contamination, water impact, and environmental searches have not been undertaken prior to determination, with the suggestion that these would be addressed post-approval.

This approach is procedurally unsound and undermines the planning process. The Town and Country Planning (Environmental Impact Assessment) Regulations 2017 and the precautionary principle** require that significant environmental effects are identified, assessed, and mitigated before consent is granted**, not retrospectively.

Approving development in the absence of such assessments would be unreasonable, risky, and potentially unlawful.

3. Constraints Acknowledged but Not Adequately Addressed

The application itself identifies up to 18 constraints, yet fails to demonstrate how these constraints can be satisfactorily mitigated. These include (but are not limited to):

- * Highway capacity and access limitations
- * Road safety impacts
- * Flood risk and surface water management
- * Pressure on utilities and drainage infrastructure
- * Air quality impacts
- * Noise and disturbance
- * Biodiversity and environmental net gain
- * Land contamination risk
- * Impact on existing residential amenity
- * Cumulative impacts with nearby developments

The presence of such a high number of constraints is, in itself, a strong indication that the site may be unsuitable for the scale and nature of development proposed.

4. Severe Impact on Depleted Public Services

Local public services in Gravesham are already stretched beyond capacity, including:

- * GP and primary healthcare services
- * transport services
- * NHS dental provision
- * Schools and early years provision

The application relies on inaccurate population and occupancy assumptions, which directly undermine the credibility of the figures presented for:

- * School place availability

- * GP-to-patient ratios
- * Healthcare capacity assessments

Any conclusions drawn from these flawed inputs are unreliable. Approval on this basis would conflict with NPPF paragraph 92, which seeks to ensure that development supports healthy, inclusive communities with adequate infrastructure.

5. Health and Environmental Impacts

The proposal would have a negative impact on public health and environmental quality, through:

- * Increased traffic-related air pollution
- * Noise impacts
- * Loss of environmental quality and green infrastructure
- * Increased pressure on already inadequate health services

The NPPF (paragraphs 174 and 180) is clear that planning decisions should prevent new development from contributing to unacceptable levels of pollution or risk to human health. This application fails to demonstrate compliance.

6. Unacceptable Highway and Road Safety Risks

The development would significantly increase traffic movements on local roads that are already operating at or near capacity. Insufficient evidence has been provided to demonstrate that:

- * Junctions can operate safely
- * Pedestrian and cyclist safety will not be compromised
- * Emergency vehicle access will remain reliable

This is contrary to NPPF paragraph 115, which states that development should only be prevented or refused on highways grounds if there would be an unacceptable impact on highway safety - a threshold which this proposal clearly meets.

In summary, this application should be refused on the grounds do highlighted above.

Kind regards