

Comments summary

Dear Sir/Madam,

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

Comments were submitted at 25/01/2026 6:31 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] Castlefields Istead Rise

Comments Details

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

Reasons for comment:

Comments: I formally object to this planning application:

****1. INADEQUATE TRANSPORT INFRASTRUCTURE****

Istead Rise is car-dependent with no railway station (nearest Meopham 1.7 miles away), infrequent bus services, and no cycling infrastructure. Development will generate 70+ morning and 76+ evening peak movements (developer's own figures), but realistic estimates exceed 300+ movements given 154 homes requiring multiple vehicles in this rural location (minimum 231 vehicles at 1.5 per household). Violates NPPF Paragraphs 109 and 110 requiring sustainable transport provision. Fundamentally unsustainable in transport terms.

****2. DANGEROUS HIGHWAY ACCESS****

Single access via Downs Road immediately adjacent to Istead Rise Primary School creates severe child safety risks during drop-off/pick-up. Requires demolition of No. 64 Downs Road. No alternative emergency access exists. Existing congestion will worsen significantly, endangering schoolchildren and pedestrians. Breaches NPPF Paragraphs 115(b) and 116 on safe access and highway safety, plus Kent Highway Standards.

****3. HEALTHCARE CAPACITY CRISIS****

Istead Rise Surgery confirmed at full capacity, cannot accept new patients. Adding ~370 residents (154 homes × 2.4 persons) requires 370 GP registrations with no mitigation proposed. Dentists similarly overstretched, most not accepting

NHS patients. Nearest alternatives in Gravesend also at capacity. Violates NPPF Paragraphs 98 and 100 requiring adequate community facilities and infrastructure.

****4. INAPPROPRIATE GREENBELT DEVELOPMENT****

Site entirely within Metropolitan Greenbelt, outside development limits, comprising productive farmland. Serves critical purposes: preventing sprawl, maintaining gap to New Barn, safeguarding countryside. No very special circumstances demonstrated. Developer's "Greybelt" argument invalid-agricultural land specifically excluded from Grey Belt. Conflicts with NPPF Paragraphs 147-151 and Local Plan policies.

****5. FLOODING AND DRAINAGE****

Downs Road was built on an old riverbed and suffers from regular standing water after heavy rain. The site provides a natural soakaway. Concreting 8-9.6 hectares will increase runoff and flood risk to neighbors. SuDS proposals raise maintenance, capacity, and failure concerns. Breaches NPPF Paragraph 171 prohibiting developments increasing flood risk elsewhere.

****6. BIODIVERSITY AND PROTECTED SPECIES****

Site supports protected species: yellow wagtails (Red List), bats, adders, badgers. Complete habitat destruction across 8-9.6 hectares. Unclear if mandatory 10% biodiversity net gain achieved. Violates Environment Act 2021, Wildlife and Countryside Act 1981, and NPPF Paragraph 180 on protecting biodiversity.

****7. INADEQUATE EDUCATION PROVISION****

Developer acknowledges 45 primary and 32 secondary pupils. Istead Rise Primary at capacity. Proposed 1.5-form entry expansion inadequate-fails to address space, staffing, funding, secondary capacity, or timing. No local secondary school. Breaches NPPF Paragraph 100 giving great weight to school provision and Education Act 1996.

****8. AIR QUALITY IMPACT****

Multi-year construction adjacent to primary school exposes children to dust, noise, contaminants. Children with asthma particularly vulnerable. Operational phase adds 231+ vehicles increasing NO₂ and particulates. Conflicts with NPPF Paragraphs 187(e) and 199 on air quality.

****9. LOSS OF AGRICULTURAL LAND****

Site comprises productive Grade 3 arable farmland. Permanent food production loss contradicts post-Brexit food security priorities. Violates NPPF Paragraphs 187(b) and 188 on protecting agricultural land.

****10. INADEQUATE PARKING****

Rural location requires 2-3 spaces per dwelling (308-462 total). Insufficient provision causes on-street parking, congestion, safety risks, emergency vehicle obstruction. Conflicts with Kent Parking Standards, NPPF Paragraph 112, and Manual for Streets.

****11. VILLAGE CHARACTER****

11% housing stock increase (population 3,437) creates suburban sprawl inconsistent with rural character. Loss of countryside, erosion of gap to New Barn, urbanization harms village identity. Breaches NPPF Paragraphs 132, 135, and 187 on character and countryside.

****12. CUMULATIVE IMPACT****

Combined with Gravesham-wide pressures: overwhelming infrastructure strain, irreversible Greenbelt loss, dangerous precedent. Breaches NPPF Paragraph 198 on cumulative environmental impacts.

****CONCLUSION****

This constitutes inappropriate, unsustainable Greenbelt development causing demonstrable harm to highway safety, healthcare, education, flood risk, biodiversity, air quality, agricultural land, parking, and village character. No exceptional circumstances justify Greenbelt release. Housing need does not outweigh extensive policy conflicts and material harms. Approval sets a dangerous precedent for Greenbelt erosion. I respectfully urge REFUSAL and request notification.

Kind regards