

Comments summary

Dear Sir/Madam,

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

Comments were submitted at 24/01/2026 9:36 AM 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:	Downs Road Istead Rise

Comments Details

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

Reasons for comment:

Comments:

Dear Sir or Madam,

Re: Planning Application 20251233 - Demolition and access road for 154 dwellings, Istead Rise, Kent

I formally object to this application. It conflicts with the National Planning Policy Framework (NPPF 2024), the adopted Gravesham Local Plan Core Strategy (2014), and other material considerations. Individually and cumulatively, the proposal would cause unacceptable harm that outweighs any benefits.

1. Green Belt Harm

The site lies in Green Belt land, where development is inappropriate by definition unless it meets limited exceptions or very special circumstances. The proposed demolition and construction of a permanent access road for 154 dwellings:

- * Encroaches into the countryside
- * Permanently reduces openness
- * Introduces urbanising infrastructure

The applicant has not shown the site contributes weakly to Green Belt purposes, nor demonstrated very special circumstances.

2. Local Plan Conflict

The proposal conflicts with:

- * CS02 (Green Belt) - preserve openness
- * CS11 (Transport) - avoid unacceptable highway risk
- * CS12 (Flood Risk) - ensure safe drainage
- * CS14 (Managing Development) - protect amenity
- * CS19 (Biodiversity) - protect habitats

These policies carry full statutory weight.

3. Planning History & Appeals

Previous refusals, including 20190372 (2019), rejected residential development here for Green Belt harm. A 2024 appeal in Gravesham was dismissed for the same reason, confirming that even under the 2024 NPPF, Green Belt protections are robust. This proposal would cause greater harm due to its scale and permanent access road.

4. Highway & Pedestrian Safety

The sole access for 154 homes is immediately adjacent to Istead Rise Primary School, increasing traffic and creating unsafe conditions for children, parents, and staff. This conflicts with NPPF guidance and CS11. The risk is foreseeable and avoidable.

5. Harm to School & Children

Construction over 3-5 years would expose the school to noise, dust, vibration, heavy vehicles, and visual disruption, harming learning and wellbeing, contrary to national policy and CS14. Mitigation would be insufficient.

6. Biodiversity

The site supports protected species. The proposal conflicts with CS19 and national policy, failing to show that habitat loss can be mitigated or biodiversity net gain achieved.

7. Flood Risk

The land floods locally. The proposed drainage does not ensure long-term safety, contrary to CS12 and national policy.

8. Infrastructure Pressure

Local GP surgeries, schools, and services are already stretched. 154 dwellings would increase demand without secured infrastructure, contrary to CS08 and national policy.

9. Cumulative Harm

The development would cause:

- * Green Belt harm
- * Safety risks to children
- * Harm to education and amenity
- * Biodiversity loss
- * Flooding issues
- * Pressure on infrastructure

These harms clearly outweigh any benefits.

Conclusion

The proposal is contrary to national and local planning policy. Past refusals and recent appeals confirm consistent Green Belt protection. No very special circumstances have been demonstrated.

I respectfully request that planning application 20251233 be refused.

Kind regards