

Comments summary

Dear Sir/Madam,

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

Comments were submitted at 14/01/2026 7:36 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:	[REDACTED]

Comments Details

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

Reasons for comment:

Comments: Objection to Planning Application 20251233
Land at Rose Farm, Downs Road, Istead Rise

I object to this application on the following material planning grounds:

- Green Belt / Principle of Development

The application site lies within the Green Belt and open countryside, where there is a strong presumption against inappropriate development.

The proposal for up to 154 residential dwellings constitutes inappropriate development in the Green Belt and is therefore harmful by definition, contrary to NPPF paragraphs 147-148.

The applicant has failed to demonstrate Very Special Circumstances that would clearly outweigh the harm to the Green Belt.

The development would result in:

- Loss of openness

- Encroachment into the countryside

- Urban sprawl - contrary to the purposes of Green Belt designation set out in NPPF paragraph 138.

The proposal conflicts with Gravesham Local Plan Core Strategy Policies CS02 and CS19.

- Scale of Development and Settlement Coalescence

A development of up to 154 dwellings is wholly disproportionate to the size,

character, and capacity of Istead Rise.

The proposal would fundamentally alter the rural/semi-rural character of the area and contribute to settlement coalescence, contrary to:

- Core Strategy Policy CS19
- Saved Policy TC2

Granting outline permission would establish a harmful precedent for further large-scale development on surrounding Green Belt land.

- Highway Safety and Access - Adjacent to a Primary School

Access is not a reserved matter, making this issue central to the application.

The only access point to the proposed development is located adjacent to a primary school, giving rise to serious highway and pedestrian safety concerns.

This location already experiences:

- High pedestrian activity, including young children
- Congestion at school drop-off and pick-up times
- Existing traffic pressures on Downs Road

The additional traffic generated by up to 154 dwellings, including service and construction vehicles, would create unacceptable safety risks, contrary to:

- Core Strategy Policy CS11
- NPPF paragraphs 110 and 115

The proposal fails to demonstrate that safe access can be achieved for:

- Children and parents
- Pedestrians and cyclists
- Emergency and service vehicles

- Flood Risk and Drainage

The application fails to adequately address surface water flooding and drainage capacity.

Large-scale development on undeveloped land risks increasing runoff and flood risk both on and off site.

Insufficient detail has been provided to demonstrate compliance with:

- NPPF paragraphs 159-169
- Core Strategy Policy CS08

The outline nature of the proposal leaves unacceptable uncertainty as to how flood risk would be safely managed.

- Wildlife, Ecology and Biodiversity Impact

The site comprises Green Belt farmland and undeveloped countryside, which provides suitable habitat for protected and priority species, including:

- Bats (all species protected)
- Great crested newts
- Reptiles
- Ground-nesting birds
- Hedgehogs (UK Priority Species)

The application fails to demonstrate that adequate ecological surveys have been undertaken to establish the presence or absence of protected species.

Granting outline permission without full ecological assessment risks irreversible harm, contrary to NPPF paragraph 180.

The proposal would result in:

- Loss and fragmentation of habitats
- Disruption of wildlife corridors
- Increased lighting, noise, and human activity

The application does not clearly demonstrate how the mandatory 10% Biodiversity Net Gain required under the Environment Act 2021 would be achieved.

This conflicts with:

- NPPF paragraphs 174 and 180
- Core Strategy Policy CS12 (Environmental Assets)

- Unsustainable Location and Car Dependency

The site is poorly served by public transport, meaning future residents would be

heavily reliant on private vehicles.

This conflicts with:

- Core Strategy Policy CS02
- NPPF Section 9, which seeks to promote sustainable transport patterns.

- Infrastructure Capacity

The proposal fails to demonstrate that existing infrastructure can support development at this scale, including:

- School capacity
- Healthcare provision
- Utilities and drainage

This is contrary to Core Strategy Policy CS08.

- Outline Application - Loss of Proper Scrutiny

Granting outline permission for development of this magnitude, with all matters reserved except access, would remove meaningful public scrutiny.

Once the principle of development is accepted, later objections become significantly harder, even if serious harm becomes apparent.

- Conclusion

The proposal represents inappropriate Green Belt development, poses serious highway safety risks adjacent to a primary school, increases flood risk, and threatens protected wildlife and biodiversity.

It is contrary to the Gravesham Local Plan and the National Planning Policy Framework.

I respectfully request that planning permission is refused.

Kind regards