


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 7:47 AM from 

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: 

Email: 

Address: 

Comments Details

Commenter Type: Member of the Public

Stance: Customer objects to the Planning Application

Reasons for comment:

Comments: Planning Application 20251233 - Objection

I object to this application for the following material planning reasons:

1. Inappropriate Green Belt Development

The site lies within the Green Belt.

The proposal for up to 154 dwellings constitutes inappropriate development under NPPF paragraph 147 and is therefore harmful by definition.

No Very Special Circumstances have been demonstrated that clearly outweigh harm to:

- Green Belt openness
- The countryside

The proposal conflicts with NPPF paragraphs 138 and 148 and Core Strategy Policies CS02 and CS19.

2. Harm to Character and Settlement Coalescence

The scale of development is not commensurate with the size or character of Istead Rise.

The proposal would have a significant urbanising effect and contribute to settlement coalescence, contrary to:

- Core Strategy Policy CS19
- Saved Policy TC2
- NPPF paragraph 130

3. Highway Safety - Access Adjacent to a Primary School

Access is not a reserved matter.

The sole access is located immediately adjacent to a primary school, in an area of high pedestrian and child activity.

Traffic generated by up to 154 dwellings would materially increase safety risks.

The proposal fails to demonstrate that safe and suitable access can be achieved, contrary to:

- NPPF paragraphs 110 and 115
- Core Strategy Policy CS11

4. Flood Risk and Drainage

Insufficient information has been provided to demonstrate that surface water and flood risk can be safely managed.

The outline nature of the application leaves fundamental drainage matters unresolved, contrary to:

- NPPF paragraphs 159-169
- Core Strategy Policy CS08

5. Ecology and Biodiversity

The site comprises undeveloped Green Belt land capable of supporting protected and priority species.

Adequate ecological survey information has not been provided.

Granting permission without this information risks irreversible harm, contrary to:

- NPPF paragraphs 174 and 180
- Core Strategy Policy CS12

The application fails to clearly demonstrate delivery of the mandatory 10% Biodiversity Net Gain.

Conclusion

The proposal represents inappropriate Green Belt development, causes harm to character, presents unacceptable highway safety risks adjacent to a primary school, and fails to adequately address flood risk and ecology.

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

Planning permission should be refused.

Kind regards