

# Comments summary

Dear Sir/Madam,

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

Comments were submitted at 08/01/2026 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]

## Comments Details

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

Reasons for comment:

Comments: I wish to object to the to this planning application on the following grounds:

### 1. Unjustified Loss of Greenfield Land

The application site is a greenfield site, and its proposed development for up to 154 dwellings represents a permanent and unjustified loss of open land.

The Councils Strategic Spatial Strategy policy directs development to the most sustainable locations and seeks to protect the character of non-urban land. The Councils housing supply policy does not support the release of greenfield sites unless clearly justified. The applicant has failed to demonstrate that the development of this greenfield site is necessary or that reasonable brownfield alternatives have been exhausted.

The proposal would erode the openness of the area, harm local character, and set a harmful precedent for further greenfield development.

### 2. Overdevelopment and Harm to Local Character

The proposed quantum of up to 154 dwellings represents overdevelopment that is incompatible with the established character of Istead Rise.

The Councils Development and Design Principles policy requires development to

respect local density, scale, and settlement pattern. Even at outline stage, the scale of development proposed is excessive and raises serious concerns that a policy-compliant scheme could be achieved without causing visual and spatial harm. The lack of detail at outline stage prevents proper scrutiny and weighs against the proposal.

### 3. Severe Highway Safety Risks Adjacent to Istead Rise Primary School

The most critical issue with this proposal is highway safety, given that the sole access to the development so close to Istead Rise Primary School.

The Council's transport policy quite rightly requires development to ensure safe and suitable access for all users, with particular emphasis on pedestrian safety and vulnerable road users. A development of up to 154 dwellings would generate a substantial increase in vehicle movements and many of these movements will coincide with already busy peak hours.

This increased traffic would directly coincide with school drop-off and pick-up times, creating an unacceptable and foreseeable risk to children, parents, and school staff. Young children are especially vulnerable road users, and the intensification of traffic movements at this location would significantly increase the likelihood of conflict between vehicles and pedestrians.

In my opinion the planning application fails to demonstrate how:

- Child pedestrian safety will be prioritised and protected
- Traffic conflicts during school peak hours will be avoided
- Construction traffic will be safely managed without endangering children

### 4. Pressure on GP and Healthcare Provision in Istead Rise

The Council's Community Infrastructure policy requires development to be supported by adequate healthcare provision. GP services in Istead Rise are already under significant pressure, with residents experiencing difficulty accessing timely appointments. This has already been exacerbated by the closure of GP facilities in Higham

An additional 154 dwellings would introduce a substantial number of new residents, putting further pressure on existing local GP services. The application provides no robust evidence that local healthcare capacity can accommodate this increase in population, nor does it propose effective mitigation measures.

The failure to address the cumulative impact on primary healthcare provision renders the proposal unsustainable.

### 5. Residential Amenity and Lack of Detail

It is important that any new proposal seeks to protect existing residential amenity facilities. The scale of development proposed raises serious concerns regarding noise, disturbance, overlooking, and general intensification of activity in this area of Istead Rise.

Given the outline nature of the application, there is insufficient information to properly assess these impacts. Deferring such fundamental considerations to reserved matters stage is inappropriate for a development of this size and scale.

This outline planning application conflicts with multiple policies of the Gravesham Local Plan. It proposes the unjustified loss of greenfield land, constitutes overdevelopment, presents serious and unacceptable highway safety risks—particularly to children attending Istead Rise Primary School—and fails to address the already stretched GP healthcare provision in Istead Rise.

For these reasons, I strongly urge Gravesham Borough Council to refuse planning permission.

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Kind regards