

Comments summary

Dear Sir/Madam,

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

Comments were submitted at 21/01/2026 1:47 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] Wrotham Road Istead Rise

Comments Details

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

Reasons for comment:

Comments: FORMAL OBJECTION - LAND AT ROSE FARM, DOWNS ROAD, ISTEAD RISE

Outline application for up to 154 residential dwellings

I object to the above planning application on the grounds that it conflicts with the National Planning Policy Framework (NPPF) and the Gravesham Local Plan Core Strategy, and would result in significant, cumulative and irreversible planning harm. The adverse impacts clearly and demonstrably outweigh the claimed benefits.

The application site lies wholly within the Metropolitan Green Belt. Under paragraph 153 of the NPPF, inappropriate development is, by definition, harmful and should not be approved except in very special circumstances. The proposal does not fall within any category of appropriate development set out in paragraphs 154-156 and is therefore inappropriate by definition.

The applicant has failed to demonstrate very special circumstances. Reliance on housing delivery, economic output and SME housebuilder support represents generic benefits that have consistently been found at appeal not to outweigh Green Belt harm. Paragraph 156 of the NPPF confirms that unmet housing need does not automatically justify Green Belt release. There is also no robust evidence that reasonable non-Green Belt alternatives have been exhausted.

The site does not meet any emerging "Grey Belt" criteria. It is open, undeveloped countryside, not previously developed land, and makes a strong contribution to Green Belt purposes including preventing encroachment, preserving openness, maintaining settlement form and protecting tranquillity.

The proposal also conflicts with the Gravesham Local Plan Core Strategy (Policies CS02, CS07 and CS12). The site lies outside the defined settlement boundary of Istead Rise and the development represents a major and unjustified outward expansion into open countryside, contrary to the adopted spatial strategy.

Granting permission would be premature. The site is not allocated for development and strategic Green Belt release should be considered through the Local Plan process, not via a speculative outline application. Approval would undermine the plan-led system, contrary to paragraphs 48 and 49 of the NPPF.

The scale of development (up to 154 dwellings) represents overdevelopment in relation to the size, character and infrastructure capacity of Istead Rise, contrary to paragraphs 131 and 135 of the NPPF.

Highway impacts would be severe, meeting the refusal test in paragraph 116 of the NPPF. The Lewis Road / Wrotham Road junction already experiences congestion and safety issues, particularly during school peak times. Traffic generated by 154 dwellings would materially worsen conditions. The Transport Assessment fails to robustly address cumulative impacts or emergency access resilience, contrary to paragraphs 114 and 115.

The site directly adjoins Istead Rise Primary School. Multi-year construction activity, increased HGV movements and long-term traffic growth create unacceptable safeguarding risks for children, contrary to paragraphs 92 and 110 of the NPPF.

The Air Quality Assessment significantly underplays prolonged construction impacts, diesel emissions and dust exposure. Given the immediate proximity to a primary school, the precautionary principle should apply, consistent with paragraph 191 of the NPPF.

The proposal would introduce a significant new population-potentially over 400 residents-yet provides no additional school or GP provision. No evidence has been provided that existing education or healthcare facilities have capacity to absorb this demand. Reliance on uncertain future mitigation creates a clear infrastructure deficit, contrary to paragraphs 16, 34 and 93 of the NPPF.

As an outline application, quantum and access are fixed, yet key impacts are deferred to Reserved Matters. This prevents proper assessment of irreversible impacts, contrary to paragraph 68 of the NPPF.

The development would result in permanent loss of open countryside, tranquillity and visual amenity, conflicting with paragraph 135 of the NPPF. Claimed biodiversity net gain does not compensate for habitat loss, fragmentation and long-term delivery uncertainty, contrary to paragraph 186.

Taken together, the proposal constitutes inappropriate Green Belt development, fails to demonstrate very special circumstances, results in severe highway impacts, unacceptable risks to children and public health, inadequate infrastructure provision, and significant environmental and amenity harm.

I respectfully request that planning permission is refused.

Kind regards

