

Comments summary

Dear Sir/Madam,

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

Comments were submitted at 19/01/2026 11:11 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] Castlefields Istead Rise Gravesend

Comments Details

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

Reasons for comment:

Comments:	The site is shown as Grade 3 agricultural land on the DEFRA Provisional ALC map, covering both Grades 3a and 3b. No site-specific survey has been provided, so it cannot be confirmed that Best and Most Versatile land would not be lost. National policy protects BMV land, and without proper evidence the application is inadequately justified and cannot be robustly assessed. The site lies within the Green Belt, where openness and preventing encroachment are key purposes. The proposed 154 dwellings would cause a permanent and significant loss of open land, eroding the separation between Istead Rise and the surrounding countryside. No very special circumstances have been demonstrated to outweigh this harm. The applicant relies on theoretical GP-to-population ratios that do not reflect real-world capacity. Downs Way and Meopham Medical Practices have confirmed they are already operating at full capacity. No secured or deliverable mitigation has been provided, contrary to national policy requiring developments to avoid placing unacceptable pressure on community facilities. Local primary schools are oversubscribed with existing waiting lists. The development would add further demand with no evidence that additional places could be delivered in time. The proposal fails to demonstrate sufficient education infrastructure.
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There is no capacity - either physically or in terms of traffic flow - to accommodate construction vehicle movements. This would create congestion and pose serious safety risks to residents. The danger is particularly acute for children attending the nearby school, as the site entrance is extremely close to the main school access point.

The site forms part of an established network of green space that supports local wildlife. Development would permanently remove greenfield land and reduce habitat connectivity within an already pressured landscape.

2025 ecological surveys found eight species of bats using the site, including active roosts in Evelyn Cottage and nearby farm buildings. Bats and their roosts are protected in law, and the survey concludes that the development would cause irreversible habitat loss that cannot be fully compensated.

The Breeding Bird Survey recorded 36 species using the site, including red- and amber-listed species and Section 41 priority species such as House Sparrow, Dunnock, Linnet and Greenfinch. Adjacent farmland also supports Skylark, Corn Bunting and Yellow Wagtail. The development would result in habitat loss and fragmentation contrary to national and local biodiversity objectives.

The proposal would risk the loss of potentially high-value agricultural land, cause substantial Green Belt harm, reduce biodiversity, create major construction-phase safety issues, and place unacceptable pressure on local healthcare and education services. Without robust evidence or secured mitigation, the development is not sustainable and should be refused.

Kind regards