

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 11:39 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] Rennie St London

Comments Details

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

Reasons for comment:

Comments: I write to formally object to the above planning application. Although submitted as an outline application with access only for determination, the proposal clearly represents the enabling phase of a major residential development on land within the Metropolitan Green Belt.

My objection is based on the following material planning considerations.

Inappropriate Development in the Green Belt

The site lies within the Metropolitan Green Belt, as designated by Gravesham Core Strategy Policy CS02. The proposed access constitutes inappropriate development, introducing permanent and urbanising infrastructure that would harm the openness and permanence of the Green Belt and facilitate further encroachment into open countryside.

In accordance with paragraphs 137-151 of the National Planning Policy Framework (NPPF), such development should not be approved unless very special circumstances are demonstrated. No such circumstances have been robustly or convincingly evidenced, and any perceived benefits do not clearly outweigh the harm caused, either individually or cumulatively.

Access Cannot Be Properly Assessed in Isolation

While access is the only matter for determination, it is expressly designed to serve up to 154 dwellings. Its impacts are therefore inseparable from the scale, layout, density, internal road network, parking provision, landscaping, drainage, and construction arrangements of the wider development.

Approving access at this stage would effectively establish the principle of development and prejudice the determination of reserved matters, preventing meaningful public scrutiny and undermining Core Strategy Policy CS19.

Highway Safety and Traffic Impact

Downs Road already experiences congestion and capacity issues, particularly during peak periods. The introduction of a single access point serving up to 154 dwellings would result in a substantial increase in vehicle movements, exacerbating existing problems and increasing conflict with pedestrians, cyclists, and equestrian users.

The submitted Transport Statement does not adequately demonstrate that the local highway network can safely accommodate this increase, nor does it robustly assess cumulative impacts arising from other committed or emerging developments in the area. This conflicts with Core Strategy Policy CS11, Local Plan Policy T1, and NPPF paragraph 115, which states that development should be refused where residual cumulative impacts would be severe.

Harm to Character, Openness, and Visual Amenity

The site currently contributes to the openness of the countryside and forms a clear and important transition between the built-up area of Istead Rise and open land beyond. The proposed access would introduce engineered highway features, lighting, and signage that would urbanise this edge, harming local character and visual amenity.

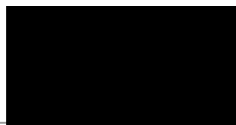
This conflicts with Core Strategy Policies CS07 and CS12, which seek to protect settlement character, landscape quality, and the intrinsic beauty of the countryside.

Infrastructure, Construction, and Environmental Concerns

The proposal would place additional pressure on local infrastructure, including schools, healthcare, transport, and community facilities, without sufficient evidence that capacity exists, contrary to Core Strategy Policy CS08. The application also fails to adequately address the impacts of construction traffic, noise, dust, and disruption on existing residents.

In addition, the application lacks sufficient ecological detail to demonstrate that impacts on biodiversity and wildlife can be adequately mitigated, raising concerns under Core Strategy Policy CS12 and NPPF Chapter 15.

For the reasons outlined above, I respectfully request that this application be refused. The proposal represents inappropriate development in the Green Belt, causes harm to highway safety, local character, landscape openness, and infrastructure capacity, and seeks approval for access without sufficient information to allow proper assessment.



Kind regards

