

Comments summary

Dear Sir/Madam,

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

Comments were submitted at 29/08/2026 10:59 AM from [REDACTED]

Application Summary

Address:	Land North Of The Drove Way Istead Rise Gravesend Kent DA13 9JY
Proposal:	Development for up to 100 residential dwellings (Class C3), including the formation of new accesses from The Drove Way, the provision of new areas of public open space and all other associated infrastructure and ancillary works (all detailed matters reserved other than means of access).
Case Officer:	Ms Rebecca Harrison

[Click for further information](#)

Customer Details

Name:	[REDACTED]
Email:	[REDACTED]
Address:	[REDACTED] The Drove Way Istead Rise Gravesend

Comments Details

Commenter Type:	Neighbour
Stance:	Customer objects to the Planning Application
Reasons for comment:	
Comments:	I strongly object to Planning Application 20260649 for up to 100 dwellings.

1. "GREY BELT" IS NOT AN AUTOMATIC ROUTE TO DEVELOPMENT

This land remains Green Belt. "Grey belt" is a policy category within the Green Belt and must satisfy specific national tests.

The applicant argues that this site makes only a weak or negligible contribution to certain Green Belt purposes. However, Gravesham's earlier assessment rated the relevant parcel as making an overall MODERATE contribution.

The Council should therefore make its own independent judgement and not simply accept the applicant's conclusion. Even if the site meets the grey-belt definition, the proposal must still satisfy wider NPPF tests, including whether the location is genuinely sustainable.

2. THIS IS NOT A GENUINELY SUSTAINABLE LOCATION

The applicant describes the site as highly accessible, yet its own Transport Assessment shows the main 308 bus operates only around seven times per day in each direction. Several other services operate just once per day with no weekend service.

Meopham Station is approximately 3.1km away, around a 39-minute walk, which

the applicant acknowledges is beyond the standard walking threshold.

Future residents would therefore remain heavily dependent on cars for work, education, rail travel, shopping and other daily needs. This questions whether the sustainable-location test is met.

3. TRAFFIC IMPACT

The applicant's traffic case relies on a targeted 10% reduction in vehicle trips through a Travel Plan and assumed changes in residents' behaviour.

That assumption is questionable in a village with limited public transport and no railway station.

Development traffic would feed through The Drove Way into the existing Istead Rise/Wrotham Road network, adding to congestion, school traffic and pressure towards the A227 and A2. KCC Highways should assess realistic car use, not an optimistic behavioural target.

4. INFRASTRUCTURE CAPACITY HAS NOT BEEN DEMONSTRATED

Another 100 homes could mean around 250-300 additional residents, creating extra demand for schools, GP services, dentistry, wastewater capacity, roads, public transport and community facilities.

Before approval, the Council should be satisfied that sufficient capacity exists or that necessary additional provision can be secured. Existing residents should not be left to absorb further infrastructure pressures.

5. IMPORTANT TECHNICAL MATTERS REMAIN UNRESOLVED

Southern Water has required further network modelling before confirming wastewater capacity.

The drainage assessment states further investigation is required to confirm groundwater conditions. Both proposed infiltration basins were unable to achieve half-drain times below 24 hours in the 1-in-100-year event.

The contaminated-land assessment recommends intrusive soil testing and ground-gas monitoring. HSE has also identified two major accident-hazard gas pipelines close to the development, while overhead electricity infrastructure is immediately adjacent.

6. PERMANENT LOSS OF PRODUCTIVE AGRICULTURAL LAND

This is actively farmed agricultural land which has formed part of the rural landscape for decades and continues to be cultivated and harvested.

The applicant's own documents describe the site as agricultural land under production and record its long-standing arable use.

Productive farmland should not be permanently replaced by houses, roads and parking without compelling justification. Once developed, its agricultural use is effectively lost.

7. ECOLOGY AND ARCHAEOLOGY

The applicant's surveys recorded 34 bird species, including six Species of Principal Importance and nine Red List species, together with at least six bat species using the site and its boundaries.

The heritage assessment places the site within a KCC Archaeological Notification Area, identifies moderate potential for prehistoric to Roman remains and records possible capped chalkwells at the southern edge.

CONCLUSION

The key issue is not whether the developer can label this land "grey belt", but whether this Green Belt site genuinely satisfies the tests required for major residential development.

Given the conflict with Gravesham's earlier Green Belt assessment, limited public transport, car dependency, unresolved infrastructure and drainage matters, pressure on local services and the permanent loss of productive agricultural land, I do not believe that case has been made.

I respectfully request that Gravesham Borough Council REFUSE Planning Application 20260649.

Kind regards