

FORMAL OBJECTION – PLANNING APPLICATION 2026049

Proposed Development of Approximately 250 Homes – Istead Rise

To: Gravesham Borough Council – Planning Department

Planning Application Reference: 20260649

Site areas:

- Land west of the A227
- Rose Farm
- Willerby Farm
- Land at Longfield Avenue

I wish to register my **strongest possible objection** to the proposed development of approximately 250 homes across the four sites around Istead Rise.

This objection is not based on opposition to housing in principle. It is based on the **scale and cumulative impact of this development, the pressure it would place on already stretched local infrastructure and services, the loss of countryside/Green Belt land, and the failure to demonstrate that more sustainable alternatives have been properly exhausted.**

The proposal would represent a very substantial expansion of Istead Rise and should not be treated as simply another housing development.

1. 250 homes is an enormous increase for Istead Rise

The Council's own emerging Local Plan identifies four sites around Istead Rise and anticipates approximately **250 dwellings in total.**

This is not a minor extension to the village. It represents a major expansion which would inevitably increase demand on schools, healthcare, roads, public transport, drainage, utilities, parking and other community infrastructure.

The Council's own Infrastructure Delivery Plan recognises that the Istead Rise allocations require **primary school expansion, local highway measures and GP contributions.**

That is important.

The Council is therefore itself acknowledging that existing infrastructure cannot simply be assumed to absorb this level of development without additional intervention.

The critical question is whether those improvements will be **actually delivered, adequately funded and operational at the point they are needed,** rather than merely being identified as aspirations or financial contributions.

2. Istead Rise Primary School is already effectively full

This is perhaps the most immediate infrastructure concern. The latest Department for Education data records:

Istead Rise Primary School – capacity: 210 pupils. Current number of pupils: 211.

In other words, the school is already operating at, or marginally above, its stated capacity.

It is therefore completely unreasonable to approve another approximately 250 homes without requiring a robust and transparent assessment of the additional school places that will be required.

The Council must establish:

- How many additional primary-age children the development is expected to generate;
- Where those children will be accommodated;
- Whether Istead Rise Primary School can physically expand;
- How many additional places can actually be created;
- Who will fund the expansion;
- When those additional places will become available; and
- What happens if the required school expansion cannot be delivered.

A promise of a financial contribution is **not the same thing as providing additional school places**.

Children and families should not be moved into the development before adequate educational provision exists.

The Council's own Infrastructure Delivery Plan recognises the need for primary school expansion associated with the Istead Rise allocations.

That should be treated as a fundamental infrastructure requirement rather than an optional benefit.

3. The cumulative impact must be considered – not each site in isolation

The four sites must be assessed **cumulatively**.

It would be completely inappropriate to consider the impact of each individual site while effectively ignoring the fact that approximately 250 homes are being proposed around the same village.

The combined development will generate cumulative pressure on:

- Istead Rise Primary School;
- GP and healthcare services;
- local roads;
- junctions;
- parking;
- pedestrian safety;
- public transport;
- drainage and water infrastructure;
- local shops and services;
- community facilities; and
- the character of the village.

The Council must therefore assess the **combined effect of all four sites**, rather than relying on individual assessments which may underestimate the real-world impact on Istead Rise.

4. GP and healthcare capacity requires proper evidence

There are serious concerns about the ability of local healthcare services to absorb a significant increase in population.

The Council should require the applicant and relevant healthcare authorities to provide current evidence demonstrating:

1. The existing patient population served by the relevant GP practices;

2. Current GP and clinical capacity;
3. The additional population likely to result from the 250 homes;
4. The additional number of patients expected to register locally;
5. The additional clinical capacity required;
6. How much funding will be generated through the development;
7. What that funding will actually provide; and
8. When the additional healthcare capacity will become operational.

The Council should not simply assume that a financial contribution automatically equates to additional appointments, doctors or clinical capacity.

The impact must be assessed against the **cumulative 250-home development**, not merely against individual applications.

5. Green Belt and loss of countryside

The proposed development would result in the permanent loss of open countryside around Istead Rise.

The Council must demonstrate why this loss is justified and why previously developed land and brownfield opportunities cannot make a greater contribution towards meeting housing requirements before further countryside is released.

The principle should be simple:

Previously developed land should be prioritised wherever reasonably possible before undeveloped countryside and Green Belt land are sacrificed.

The existence of a housing requirement does not, by itself, make every Green Belt site an appropriate location for development. The Council must demonstrate that alternative sites have been properly considered and that the exceptional justification required for development affecting the Green Belt has genuinely been established.

6. Brownfield sites should be exhausted first

I strongly urge the Council to publish a clear assessment showing:

- What brownfield land is currently available within the Borough;
- What previously developed sites could accommodate housing;
- Which sites are capable of redevelopment;
- What housing capacity those sites have;
- Which sites have been discounted;
- Why they have been discounted; and
- Why Green Belt/countryside land around Istead Rise is considered preferable.

It is not sufficient to state that brownfield land alone cannot meet the Borough's entire housing requirement.

The relevant question is whether **every reasonable opportunity to use previously developed land has been maximised before placing additional pressure on rural settlements such as Istead Rise.**

7. The character of Istead Rise must be protected

Istead Rise is a village, not an urban expansion area capable of absorbing unlimited growth. The proposed development would fundamentally alter the scale and character of the settlement.

The cumulative effect of development around the village risks turning what is currently a distinct settlement surrounded by countryside into an increasingly urbanised area.

Particular consideration should be given to:

- The visual impact of development on surrounding countryside;
- The loss of open agricultural land;
- The relationship between the development sites and the existing settlement;
- The impact on the rural setting of Istead Rise;
- The cumulative urbanising effect of four separate developments; and
- Whether the resulting settlement pattern would remain proportionate and appropriate.

Once this countryside is developed, it cannot be recovered.

8. Roads and traffic

A development of approximately 250 homes will inevitably generate a significant number of additional vehicle movements.

The Council must ensure that the highways assessment properly considers the **combined impact of all four sites**, including:

- Morning and evening peak traffic;
- School traffic;
- Existing congestion;
- Junction capacity;
- Road safety;
- Pedestrian movements;
- Cycling;
- Parking;
- Emergency access;
- Construction traffic; and
- The cumulative effect of other developments in the surrounding area.

Particular attention should be paid to traffic generated during school drop-off and collection periods. It is not sufficient to assume that a proportion of new residents will walk or use public transport unless those alternatives are genuinely practical, safe and available.

9. Development should not come before infrastructure

The fundamental issue is one of sequencing.

The Council should not allow approximately 250 homes to be occupied and then attempt to resolve the resulting pressure on schools, healthcare and highways.

The necessary infrastructure should be **identified, funded, secured and deliverable before the development proceeds at a scale that overwhelms existing services**. There should be clear triggers preventing occupation of homes if essential infrastructure has not been provided.

In particular, the Council should establish enforceable mechanisms linking occupation of the development to:

- Additional school capacity;
- Necessary highway improvements;
- Healthcare provision;
- Drainage and utilities;
- Pedestrian and cycle infrastructure; and
- Other identified community infrastructure.

10. Housing numbers must not override sustainable development

I recognise that Gravesham has significant housing requirements. However, housing targets do not remove the requirement to deliver development in a genuinely sustainable manner. A development cannot be described as sustainable merely because it contributes to a housing target.

True sustainability requires consideration of whether:

the location is appropriate, the infrastructure is adequate, the transport impacts are acceptable, the environment is protected and existing communities can absorb the additional population without unacceptable harm.

In the case of Istead Rise, there are serious questions over whether those requirements can be satisfied at the scale proposed.

11. Request for refusal

For the reasons set out above, I strongly request that Gravesham Borough Council **refuse planning application 20260649.**

At the very least, the application should not be approved unless the Council has obtained robust, independently verifiable evidence demonstrating that:

1. The cumulative impact of approximately 250 homes has been properly assessed;
2. Istead Rise Primary School can provide sufficient additional places;
3. Any required school expansion is fully funded, deliverable and available at the appropriate time;
4. GP and healthcare capacity is sufficient for the additional population;
5. Highway capacity and road safety impacts are acceptable;
6. Necessary infrastructure will be delivered in step with development;
7. Brownfield and previously developed alternatives have been properly assessed and maximised;
8. The impact on Green Belt and surrounding countryside is fully justified;
9. The development would not cause unacceptable harm to the character of Istead Rise; and
10. The cumulative impact of all four sites has been considered rather than treating them as unrelated developments.

Final statement

Istead Rise should not be expected to carry a disproportionate share of Gravesham's housing requirement simply because land around the village is available for development.

The fact that approximately 250 homes can be allocated on a map does not mean that the village has the infrastructure to support them. The Council's own evidence recognises the need for school expansion, highway measures and GP contributions. Most importantly, the latest government figures show that **Istead Rise Primary School already has 211 pupils against a stated capacity of 210.**

That should be a warning that infrastructure is already under pressure. The Council must put the needs of the existing community, the protection of the countryside and the delivery of genuinely sustainable development at the centre of its decision.

I therefore respectfully but firmly ask Gravesham Borough Council to refuse planning application 20260649.

Yours Sincerely

