Comments summary

Dear Sir/Madam,

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

Comments were submitted at 24/08/2026 9:16 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]n
Address:	[redacted]The Drove Way Istead Rise

Comments Details

Commenter Type:	Member of the Public
Stance:	Customer made comments in support of the Planning Application
Reasons for comment:	
Comments:	FORMAL OBJECTION - APPLICATION 20260649, LAND NORTH OF THE DROVE WAY, ISTEAD RISE I strongly object to this application for up to 100 dwellings. 1. GREEN/GREY BELT AND PLAN-LED DEVELOPMENT This is a 5.7ha undeveloped agricultural field, not previously developed land. Gravesham's own 2020 assessment rated parcel IR4 as making an overall MODERATE contribution to the Green Belt. The applicant now argues it is "grey belt", but that does not automatically make development acceptable: the proposal must still meet NPPF tests, including being in a sustainable location. The site is not allocated for housing in Gravesham's Regulation 19 Proposed Submission Local Plan 2042. Permitting major speculative development on an unallocated Green Belt site would undermine a plan-led approach. 1. 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 - a 39-minute walk which the applicant acknowledges is beyond the standard walking threshold. Future residents would therefore remain heavily dependent on cars. This directly questions whether the NPPF sustainable-location test is met.

1. TRAFFIC IMPACT
The development is forecast to generate about 102 person trips in the AM peak and 84 in the PM peak. Even after adjustment, up to 49 AM and 47 PM peak-hour vehicle movements are predicted. Crucially, these figures rely on a targeted 10% reduction in vehicle trips through a Travel Plan and assumed changes in residents' behaviour. Given the weak public transport provision, that assumption requires rigorous testing by KCC Highways. All normal traffic would feed through The Drove Way and the existing Istead Rise/Wrotham Road network. The cumulative effects on congestion, school traffic and the A227/A2 corridor must be properly assessed.

1. INFRASTRUCTURE AND SAFETY REMAIN UNRESOLVED
When submitted, formal pre-application responses from Gravesham Borough Council and KCC Highways were still awaited. Southern Water has also required network modelling before giving its substantive response. The application should not be determined until wastewater and highway capacity are established.
HSE has identified two major accident-hazard gas pipelines close to the development and requested use of its formal planning advice process. Overhead electricity infrastructure is also immediately adjacent. These matters must be fully resolved before residential development is considered.

1. DRAINAGE AND GROUND CONDITIONS
The drainage assessment states that further site investigations are 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, requiring additional capacity for consecutive storms. Given nearby homes and soakaways, the Council must be satisfied that development will not increase drainage risk.
The contaminated-land assessment rates the risk as LOW TO MEDIUM and recommends intrusive soil testing and ground-gas monitoring due to potential sources including infilled ground and a historical landfill.

1. COUNTRYSIDE, ECOLOGY AND ARCHAEOLOGY
This development would permanently urbanise agricultural countryside with housing, roads, parking and lighting. The applicant's surveys recorded 34 bird species, including six Species of Principal Importance and nine Red List species, and at least six bat species using the site and its boundaries for commuting and foraging.
The heritage assessment places the site within a KCC Archaeological Notification Area and identifies moderate potential for prehistoric to Roman remains. It also records possible capped chalkwells at the southern edge, where contractors previously broke into two chalkwells during construction of the adjoining estate.
1. LAND CLASSIFICATION
The farmland around Istead Rise has been classified as Grade 2 and 3 and is therefore protected.

CONCLUSION
Housing need and affordable housing are important, but they do not make every Green Belt field suitable for development. The applicant's own evidence demonstrates limited public transport, reliance on assumed reductions in car use, unresolved highway, wastewater and safety matters, further drainage and ground investigations, ecological value and archaeological potential.
The development would also place additional pressure on local infrastructure, including schools, GP services, dentistry and community facilities. Before approving another 100 homes, potentially around 300 residents, the Council should be satisfied that sufficient capacity exists or can be secured.
Taken cumulatively, the applicant has not demonstrated that this is the right or most sustainable location for 100 homes. I respectfully request that Gravesham Borough Council REFUSE application 20260649

Kind regards