

Please post to: Rebecca Harrison, Planning Officer, Civic Centre, Gravesend, Kent DA12 1AU (stamp required)
(or can be left in secure drop box in Reception at Istead Rise Community Centre, Worcester Close, Istead Rise.)

Application Reference: 20260649

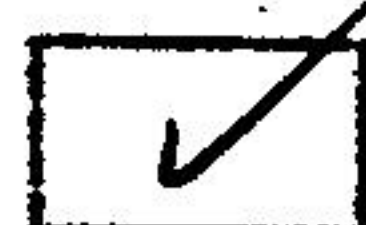
Case Officer: Rebecca Harrison

Location: Land North Of The Drove Way, Istead Rise, Gravesend, Kent

Proposal: Development for up to 100 residential dwellings (Class C3), including the formation of new accesses from The Drove Way.

I am: **A Member of the Public:**
(Age 18 or above) ☐

Neighbour of the site:



My Title & Full Name:

**My address
& postcode:**

THE DROVE WAY
ISTEAD RISE
DA13 9JZ

I wish to object to planning application number 20260649 for the reasons stated below:

See attached

Signed & dated:

(Deadline for objections: 2/9/26)

1/9/26

Comments continued overleaf



[REDACTED]
[REDACTED] **The Drove Way, Istead Rise DA13 9JZ**
[REDACTED]

I have reviewed the documentation provided in the planning application and this is my response.

Objection to Planning Application 20260649

**Land North of The Drove Way, Istead Rise
Proposed development of up to 100 residential dwellings**

I am writing to object to planning application **20260649** for the development of up to 100 houses on land north of The Drove Way.

I live at [REDACTED] **The Drove Way**, and therefore know the road and the surrounding area very well. I am not objecting simply because I don't want new houses in the area. I understand that Gravesham needs housing, including affordable housing.

My concerns are specifically about **whether this is the right site for a development of this size and the effect that it will have on The Drove Way, existing residents, the surrounding countryside, wildlife and local infrastructure.**

Having read the application documents submitted by the developer, I have particular concerns about the following.

1. The development of this Green Belt site

The site is currently open agricultural land within the Green Belt.

I understand that the applicant is relying on the new Grey Belt provisions to argue that the development can be treated as appropriate development in the Green Belt. However, I do not believe that being identified as Grey Belt should automatically mean that this particular site is suitable for 100 houses.

I am particularly concerned that the applicant's own Planning Statement acknowledges that the site was previously considered as proposed allocation **GB62**, but that it has **not been carried forward into the April 2026 Regulation 19 draft Local Plan.**

I believe this is significant and that the Council should consider carefully why the site has not been included in the latest version of its emerging Local Plan.

The emerging plan also seeks to maintain the **rural setting and character of Istead Rise**. In my view, building up to 100 houses on this open land would represent a very significant change to that setting.

I therefore ask the Council to consider carefully whether the benefits of developing this particular site outweigh the harm caused by introducing a substantial new residential development into the existing countryside.

2. The proposed access onto The Drove Way

This is my biggest concern.

The main vehicular access to the development is proposed directly from The Drove Way.

The developer's own Design & Access Statement describes The Drove Way as a **residential street with a local residential function which does not operate as a through-route**.

I agree with that description.

The Drove Way is an existing residential road. It is not a major distributor road and it currently has the character and function of a road serving the existing homes.

Adding up to 100 new houses will inevitably introduce a considerable amount of additional traffic.

This will include:

- residents' cars;
- visitors;
- deliveries;
- taxis and private hire vehicles;
- refuse and service vehicles;
- construction traffic for what could be a substantial period;
- and other commercial and maintenance vehicles.

I am concerned that the effect of this additional traffic on the existing residents and on the character and function of The Drove Way has not been given sufficient weight.

This is particularly important because **access is being determined as part of this application**, rather than being left entirely for a later reserved-matters application.

I ask the Council and KCC Highways to consider not just whether vehicles can physically enter and leave the proposed development, but **what the resulting increase in traffic will mean for the existing residential road and the people who live here**.

3. Pedestrians and the reality of getting to the bus

I am also concerned about the way the application assesses the sustainability of the site.

The applicant places considerable emphasis on the fact that bus stops and local facilities are within a particular walking distance of the development.

However, I don't think simply measuring a distance on a map tells the whole story.

The existing bus stop at the **Istead Rise shops is at the other end of The Drove Way.**

Someone living in the proposed development who wanted to use that bus service would therefore have to walk along The Drove Way to reach it.

That means that pedestrians using this route would be sharing the existing residential road with the additional traffic generated by the development itself.

I believe the Council should consider the **actual pedestrian experience**, including the safety and attractiveness of the route, rather than simply the number of metres between the development and the bus stop.

If the sustainability of the site is being relied upon as an important reason for granting permission, I believe there should be a realistic assessment of whether residents would actually be able to use public transport conveniently rather than relying on cars.

4. The change to the landscape and the view from The Drove Way

At present, residents of The Drove Way have a relationship with **open agricultural land, woodland and established vegetation.**

The proposed development would fundamentally change that.

The developer's own Landscape and Visual Impact Assessment identifies **significant adverse visual effects associated with The Drove Way.**

The application describes the proposed landscaping as creating a stronger and more defensible Green Belt boundary.

However, I don't believe that creating a new landscaped boundary around a housing development is equivalent to retaining the existing open countryside.

Once the houses, roads, gardens, lighting, cars and associated infrastructure are built, the character of this part of The Drove Way will have changed permanently.

New planting may soften the appearance of the development over time, but it cannot recreate the existing open agricultural landscape.

I therefore ask the Council to give proper consideration to the visual impact on **existing residents of The Drove Way**, rather than concentrating only on the wider landscape.

5. The woodland and wildlife

I am particularly concerned about the woodland and established vegetation around the site.

The applicant's own **Design & Access Statement** describes the woodland as the site's “**principal ecological feature**”.

The ecological assessment identifies the woodland as higher-distinctiveness habitat.

The Bat Survey also found substantial bat activity and identifies the **northern field margins and eastern woodland as important foraging and commuting areas**.

The applicant therefore relies upon the retention of these habitats as an important part of its ecological mitigation.

The Bat Survey recommends protection of the boundary habitats and particular care over lighting, including the need to prevent or minimise lighting along the northern and eastern boundaries.

This concerns me because 100 new homes will inevitably introduce considerably more lighting and human activity immediately adjacent to these areas.

I therefore ask the Council to make sure that the proposed ecological protection is **specific, enforceable and capable of being maintained in the long term**, rather than relying on general assurances that the woodland will be retained.

6. Biodiversity net gain

I have noted that the applicant's biodiversity calculation claims a biodiversity net gain of more than 20%, which is above the statutory 10% requirement.

The same calculation also records the loss of approximately **4.6 hectares of existing cropland**.

I therefore believe it is important that the Council considers what is actually being lost as well as what new habitats are proposed.

A biodiversity net gain calculation should not be treated as meaning that there is no environmental or landscape impact from replacing an existing area of open agricultural land with a housing development.

7. Drainage and wastewater

The submitted drainage assessment proposes substantial engineered drainage infrastructure, including infiltration basins.

The assessment itself acknowledges that the proposed infiltration basins do not achieve the 24-hour half-drain requirement for all storm durations during the 1-in-100-year event, although additional storage has been incorporated.

My concern is whether the proposed drainage system is sufficiently robust and reliable for the lifetime of the development, particularly given increasing rainfall and future climate conditions.

I am also concerned about the proposed foul-water arrangements.

The development requires **two foul-water pumping stations** because of the site's levels and will ultimately connect into the existing public sewer network.

Given that 100 additional homes could create a significant increase in wastewater, I believe the Council should be satisfied that there is adequate capacity and that all necessary infrastructure improvements are properly secured before development begins.

8. Local healthcare capacity

I am also concerned about the impact on local GP services.

Earlier this year, in relation to the proposed development of more than 100 houses on Downs Road, **both the Istead Rise and Meopham GP surgeries wrote stating that they did not have the capacity for additional patients**.

If the surgeries' position remains unchanged, I believe this is highly relevant when considering the cumulative effect of additional housing in the area.

The Council should establish whether sufficient additional primary healthcare capacity is available to accommodate the population generated by this development.

9. The cumulative effect on Istead Rise

I am concerned that this application should not be considered entirely in isolation.

There are already other significant housing proposals affecting Istead Rise and the surrounding area.

The applicant's own consultation exercise records that local residents raised concerns about:

- traffic and highways;
- infrastructure capacity;
- the effect on the character of the area and surrounding countryside;
- ecology; and
- construction impacts.

These are genuine concerns about the ability of the existing settlement and its infrastructure to accommodate further substantial growth.

The Council should therefore consider the **cumulative effect** of additional development on roads, public transport, healthcare, drainage, wastewater and other local services.

Conclusion

I understand that Gravesham needs new homes and that affordable housing is important.

However, I do not believe that the need for housing should automatically outweigh the particular problems associated with this site.

This proposal would change an existing open agricultural area into a substantial new residential development and would introduce the principal access for up to 100 homes directly onto **The Drove Way**.

It would increase traffic on an existing residential road, increase pedestrian movements along that road, change the landscape experienced by existing residents, and introduce significant new activity immediately alongside woodland and habitats which the applicant's own ecological reports identify as important.

It would also create additional demands on local infrastructure, including wastewater, drainage, transport and potentially primary healthcare.

For these reasons, I respectfully ask **Gravesham Borough Council to refuse planning application 20260649.**

If the Council is nevertheless minded to approve the application, I ask that it first ensures that the highway and pedestrian impacts, wastewater and drainage requirements, ecological mitigation, landscape impacts and necessary infrastructure provision are fully addressed and appropriately secured.

