

Comments summary

Dear Sir/Madam,

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

Comments were submitted at 20/08/2026 12:43 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] haven close Istead rise Gravesend

Comments Details

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

Reasons for comment:

Comments:

I wish to object to this planning application on the grounds that the proposal represents inappropriate and unsustainable additional development on the green belt in Istead Rise, which is not identified as a housing allocation in the emerging Gravesham Local Plan 2042 and has not been demonstrated to be necessary to meet an identified local housing need.

1. The site is not identified for housing in the emerging Local Plan

The emerging Gravesham Local Plan 2042 has now reached Regulation 19 Proposed Submission stage. The Council's plan identifies four specific housing sites in Istead Rise. Together these allocations provide for approximately 250 new homes in and around Istead Rise. The application site is not one of those identified allocations. This is significant because the emerging Local Plan has been prepared as the Council's strategic response to its housing requirement and has undertaken a process of assessing alternative locations for development. The Council's own strategy for Istead Rise therefore already anticipates substantial additional housing growth. This is an important material consideration and it needs to be demonstrated why development on this additional site is justified notwithstanding the Council's recently prepared spatial strategy and why further development in Istead Rise is necessary or preferable to the allocated sites.

2. There is no demonstrated need for this additional housing in Istead Rise

The most recent settlement-level Rural Housing Needs Survey for Istead Rise was undertaken in 2017. The Council has previously reported that the 2017 survey identified a need for up to 22 affordable homes. The Council has subsequently delivered a further 8 affordable homes at Worcester Close. Furthermore, the emerging Local Plan now proposes approximately 250 additional homes across four sites in and around Istead Rise. It is therefore difficult to see what evidence demonstrates a current need for the additional housing proposed by this application, over and above the substantial housing growth already committed or proposed for the settlement.

3. The cumulative impact of approximately 250 planned homes has to be considered

The application should not be assessed in isolation. The emerging Local Plan already proposes approximately 250 additional homes in Istead Rise and 100s more in its immediate surroundings, including several very large developments in Meopham. The cumulative effect of these developments needs to be considered when assessing transport, education, healthcare, drainage, recreation and other infrastructure. It would be inappropriate to consider the application solely on the basis of whether its individual impacts could theoretically be mitigated. The question is whether the existing settlement and infrastructure can accommodate this additional development when considered alongside the other planned growth. The emerging Local Plan itself recognises that the proposed Istead Rise growth needs to be supported by investment in infrastructure, including expanded primary school provision, improved public transport and enhanced active-travel routes and that existing infrastructure is simply not capable of absorbing unlimited additional development without improvement.

4. Poor accessibility and excessive reliance on private cars

The site is not sustainably located in transport terms. Istead Rise is a relatively isolated settlement and the application would generate significant additional reliance on private cars. There are no convenient, direct and safe pedestrian routes from the settlement to the principal railway stations. Residents travelling to Gravesend or Meopham railway stations would therefore have to rely heavily on cars or a combination of car and public transport. Bus provision is also limited and sporadic. It cannot reasonably be regarded as an attractive or reliable alternative to private-car travel for a substantial proportion of residents, particularly for commuting, school journeys and journeys outside normal daytime hours. This is inconsistent with the Government's objective of reducing reliance on private cars and ensuring that development is located where sustainable transport options can realistically be used. The Council's own emerging Local Plan recognises the need for enhanced public transport and active-travel provision to accompany housing growth at Istead Rise. The application should therefore not be assessed on the assumption that residents will simply choose sustainable transport. The actual accessibility of the site and the availability, frequency and practicality of alternative modes need to be demonstrated through robust evidence.

5. Existing highway network is already vulnerable to severe congestion

The additional traffic generated by the proposal would be imposed upon a highway network which is already vulnerable to significant congestion. The A227 is a critical route for Istead Rise and surrounding settlements. The wider road network is also heavily affected when incidents occur on the A2. When accidents or other incidents occur on the A2, traffic is diverted onto alternative local routes and congestion in and around Istead Rise can become severe. Therefore consideration needs to be given to not merely normal-day

traffic conditions but the resilience of the highway network and the consequences of additional development during incidents and peak periods. It would be insufficient to rely on theoretical sustainable-transport percentages where the necessary infrastructure and services do not currently exist.

6. Inadequate primary-school capacity

Education provision is another significant constraint. Istead Rise Primary School has a published capacity of approximately 210 pupils. Current published admissions information indicates that the school was oversubscribed for 2025-26, with 44 first-preference applications for only 30 available places. This is consistent with the experience of local residents, including families living within Istead Rise who have been unable to secure places at the local primary school. The effect of additional housing on school capacity must therefore be assessed cumulatively. The emerging Local Plan itself identifies expanded primary-school provision as necessary to support its proposed growth at Istead Rise. That is a strong indication that existing education infrastructure cannot simply be assumed to be adequate.

7. GP and dental provision is already under pressure

Healthcare capacity is another important infrastructure consideration. Residents currently experience difficulty accessing local primary healthcare. In particular, the local GP service is already heavily constrained, with patients reporting that the online consultation system can reach its daily capacity very early in the morning. These are not simply matters of personal convenience. The cumulative impact of population growth on local healthcare infrastructure is a legitimate planning consideration where additional development creates additional demand for services. It should not be assumed that existing healthcare provision has unlimited capacity.

8. The proposal conflicts with the emerging strategy for Istead Rise

The emerging Local Plan provides a carefully considered strategy for Istead Rise. It identifies specific locations for approximately 250 homes and states that growth should be accompanied by improvements to infrastructure, including primary education, public transport and active travel. Permitting additional unallocated development outside that strategy risks creating development in advance of the infrastructure needed to support the planned growth. It also risks creating a cumulative level of development which exceeds the capacity of the settlement's existing transport, education and healthcare infrastructure. The application should therefore be assessed against the emerging spatial strategy as a whole, rather than simply against the applicant's assessment of the individual site's suitability.

9. Conclusion

I do not object to this proposal simply because it would result in additional housing. My objection is that the applicant has not demonstrated that this additional development is necessary, appropriately located or capable of being supported by existing and deliverable infrastructure.

Kind regards