



Technical Note

Clifton Slipways

18-091-005 Rev A

Transport Technical Note – Section 73 Application

June 2026

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-	Draft for Comment	AT	CS	CG	SW	17/06/2026
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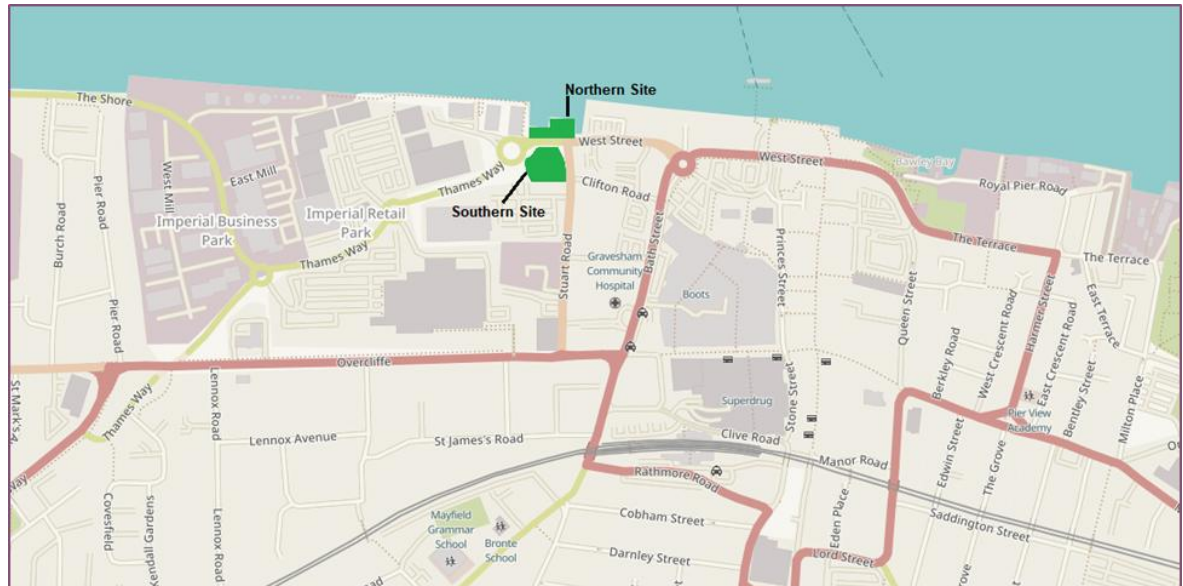
1 Introduction

1.1 Background

- 1.1.1 Charles and Associates Consulting Engineers Ltd (C&A) has prepared this Transport Technical Note in relation to the Clifton Slipways site in Gravesend. The proposed development secured planning consent from Gravesham Borough Council (GBC) in December 2020 (App ref: 20191122) for the erection of two buildings at West Street and Stuart Road to provide 227 dwellings, business accommodation and a café; with associated vehicle and cycle parking, highway works and landscaping.
- 1.1.2 Building 1 comprises the erection of a 23-storey tower on the north side of West Street to provide 121no. dwellings with 1no business Unit (B1a) comprising 90 sqm of floor space at ground floor level; and Building 2 from four storeys to 12 storeys on the south side of West Street which will provide 106no. dwellings. The proposal includes the restoration and adaptation of the existing pier structure to provide public and private amenity space to include the erection of 16no. Business(B1a) units comprising a total of 510 sqm of floor space; and a cafe (A1/A3) comprising up to 60 sqm of floor space.

- 1.1.3 The applicant is bringing forward a Section 73 Application to make changes to the approved scheme including the parking arrangements. This note outlines and justifies the revised level of parking provision being proposed, following on from a previous Section 73 Application of the same nature, submitted in October 2023 and permitted in March 2024.

Figure 1.1: Site Location



2 Scheme Changes

2.1 Application History

- 2.1.1 The original application (ref. no 20191122) was for 227 flats including 121 in the West Street building and 106 in the Stuart Road building, with 124 car parking spaces provided in the Stuart Road building (0.55 spaces per dwelling).
- 2.1.2 As set out in the TA Addendum, GBC considered that this provision was potentially too high for the site context, although at the time the applicant was keen to provide appropriate parking to meet market expectations. Following consultation, the proposals were revised to include 111 spaces (0.49 spaces per dwelling) and approved on this basis.
- 2.1.3 In early 2024 a section 73 application (Ref. no 20231123) was permitted that considered a revision of the Stuart Road building to include 115 flats, including 53 one-bedroom units and 62 two-bedroom units, with 56 associated car park spaces (0.24 spaces per dwelling).

2.2 Revised Scheme

- 2.2.1 This Section 73 application pertains to changes in the Stuart Road building. The proposed changes are as follows:

1. Level -1 – parking level and vehicular entrance have been removed including the 34 parking spaces at level -1;
2. Level 0 – the residential units of level 0 were reduced from 11 to 6, with parking spaces increased from 22 to 35, within a now enlarged external parking court. The vehicle access has been retained, while tracking of the altered parking space is shown in **Drawing 18-091-012**.
3. Levels 6-12 – these levels have been removed from the revised scheme.

2.2.2 **Table 2.1** below provides an overview of the proposed units per level, from the original planning application to the currently approved scheme to the proposed Section 73 discussed in this note.

Table 2.1: Stuart Rd Building – Proposed Flats per Level

	Original Planning Approval		Approved Scheme		Proposed Section 73	
	1Bed	2Bed	1Bed	2Bed	1Bed	2Bed
Level -1	-	-	-	-	-	-
Level 0	-	-	4	7	1	5
Level 1	4	10	6	9	6	9
Level 2	6	9	6	9	6	9
Level 3	6	9	6	9	6	9
Level 4	9	6	8	7	8	7
Level 5	6	6	5	7	5	7
Level 6	1	4	3	2	-	-
Level 7	1	4	3	2	-	-
Level 8	1	4	3	2	-	-
Level 9	1	4	3	2	-	-
Level 10	5	-	1	3	-	-
Level 11	5	-	1	3	-	-
Level 12	5	-	1	3	-	-
Total	50	56	50	65	32	46

Car Parking Considerations

- 2.2.3 As discussed above, the scheme would retain the approved 121 flats in the West Street building unaltered. The Stuart Road building is now proposed to include 78 flats, comprising 32 one-bedroom units and 46 two-bedroom units, as shown in the table above. This would result in a total of 199 units across both buildings.
- 2.2.4 Residential car parking would continue to be provided in the Stuart Road building to serve both buildings, but the number of spaces would reduce from 56 to 35 (0.18 spaces per dwelling). Spaces will not be allocated to specific dwellings but instead leased separately to interested residents.
- 2.2.5 It is intended that 3 of the car spaces would be marked for disabled residents, representing 9% of the total provision. Kent Parking Guidance does not specify disabled provision for residential developments. Nevertheless, for business premises a provision of two designated spaces and one space of sufficient size is advised for car parks up to 40 spaces, as is the proposed provision. The Parking Management Plan would prioritise these spaces for any disabled residents who need them, either during initial occupation or for new occupiers in future. Furthermore, Blue Badge holders who are visiting residents in the development will be able to park in the loading bays for each building, or nearby public car parks.

Cycle Parking

- 2.2.6 Secure and covered cycle parking would be provided at 240 spaces in the West Street building (as in the permitted scheme), plus a further 36 spaces in the Stuart Road building (an increase of 20 spaces from the 16 spaces of the currently approved scheme).
- 2.2.7 Signage for the accessible bays will be confirmed as part of the Parking Management Plan.

Car Club

- 2.2.8 The Enterprise Car Club provision would be retained from the currently approved scheme. This is a particularly useful feature to strengthen travel flexibility, allowing residents to make occasional journeys without the administrative burden and expense of traditional car ownership.
- 2.2.9 It is envisaged that the Car Club vehicles would be positioned in the laybys on West Street and Stuart Road so that the general public can use the vehicles as well as Clifton Slipways residents. These laybys will also provide space for short-stay delivery vehicles.

- 2.2.10 As discussed during the previous Section 73 application, the car club provision will start with a single vehicle on a 5-year rolling contract, with a second vehicle to be introduced once the first vehicle is being used regularly - Enterprise have suggested that this is triggered at 30% utilisation of the first vehicle.
- 2.2.11 While there are Car Club vehicles elsewhere in Kent, including nearby at Ebbsfleet and Northfleet, this would be the first such vehicle in Gravesend and so it is likely that the vehicle would benefit from suppressed demand from the surrounding area as well as the Clifton Slipways development itself.
- 2.2.12 Enterprise Car Club will provide 24/7 support for users via the smartphone app and telephone, and members will benefit from a discount on rentals with Enterprise -Rent-A-Car. In addition, businesses at the site will be provided with free Enterprise Car Club membership.
- 2.2.13 As with the original application and currently approved scheme, the details of the Car Club provision will continue to be secured via the existing Section 106 Agreement. The Travel Plan and the Parking Management Plan were secured by planning condition, and these will be provided in due course.

2.3 Travel Plan

- 2.3.1 The proposed development will also implement a robust and effective Travel Plan (TP) with the objective of encouraging and supporting sustainable travel and reducing single occupancy car use, building on the fundamental merits of the development site's location.
- 2.3.2 The aim of the TP will be to reduce the need to travel and encourage residents to travel sustainably by achieving the following objectives:
- To promote use of the alternatives to the car (pedestrian, cycle, bus and rail);
 - To reduce the number of single occupancy car trips; and
 - To reduce the demand for car parking spaces.
- 2.3.3 The TP will present the measures to promote travel by modes other than private car, while a Travel Plan coordinator will be appointed to ensure the effective implementation of the TP.
- 2.3.4 A Framework Travel Plan (FTP) has been submitted with the original application, providing further information regarding the aim, objectives and measures proposed as part of the TP for the development. More information can be found there.

3 Parking Justification

3.1 Planning Context

3.1.1 The National Planning Policy Framework (NPPF, February 2025) states within paragraph 90:

“Planning policies and decisions should support the role that town centres play at the heart of local communities, by taking a positive approach to their growth, management and adaptation. Planning policies should:

- a) Define a network and hierarchy of town centres and promote their long-term vitality and viability (...);*
- b) Define the extent of town centres and primary shopping areas (...);*
- c) Retain and enhance existing markets and, where appropriate, re-introduce or create new ones;*
- d) Allocate a range of suitable sites in town centres to meet the scale and type of development likely to be needed, looking at least ten years ahead. (...);*
- e) Where suitable and viable town centre sites are available for main town centre uses, allocate appropriate edge of centre sites that are well connected to the town centre. (...); and*
- f) Recognise that residential development often plays an important role in ensuring the vitality of centres and encourage the residential development on appropriate sites.”*

3.1.2 Paragraph 112 of the NPPF also states:

“If setting local parking standards for residential and non-residential development, policies should also take into account:

- a) The accessibility of the development;*
- b) The type, mix and use of development;*
- c) The availability of and opportunities for public transport;*
- d) Local car ownership levels; and*
- e) The need to ensure an adequate provision of spaces for charging plug-in and other ultra-low emission vehicles.”*

3.1.3 The above is also reflected in the KCC Parking Standards (January 2025)¹ that mention under the Application of Standards section the following:

¹ [Kent County Council Parking Standards](#)

“This document provides guidance on appropriate parking standards for new developments within the KCC area. It is intended to be flexible and to be the starting point for dialogue with the Local Planning and Highway Authorities.”

- 3.1.4 Moreover, the updated NPPF promotes a vision-led approach to development planning. This has brought forward a shift from the traditional predict and provide approach to a decide and provide (D&P) one. In real terms, this is reflected in the way developments are designed to prioritise sustainable and active travel instead of car trips, in a way that has the potential to shape travel patterns away from vehicle movements and towards a healthier and environmentally friendly alternative.
- 3.1.5 Constrained parking provision is a tool to achieving such a shift towards sustainable travel, while the site's location provides the ideal location for this shift, allowing easy access to a great number of amenities and destinations within walking and cycling distance.
- 3.1.6 During the approved Section 73 Application, C&A had investigated nearby planning applications in relation to parking provision.
- 3.1.7 KCC Highways in response to a number of planning applications providing a reduced parking provision had stated:

“The low level of car parking ... is acceptable for a town centre location with nearby public car parking available”.

“It is considered that the low level of parking in such a sustainable location will help to reduce the reliance on the private car for travel and is therefore acceptable in highway terms.”

- 3.1.8 Also discussed during the previous Section 73 application, that is worth mentioning again, is an application in North Kent, granted permission² by Medway Council for a scheme of 64 flats in Rochester with zero parking for residents and a Car Club vehicle, reflecting the site's proximity to the town centre and railway station. For this application the committee report states *“There is compelling evidence that car clubs reduce car ownership and encourage residents to adopt sustainable travel patterns... This has the potential to serve existing residents as well as new residents and help achieve the Council's sustainable transport aims and reduce reliance on private cars.”*

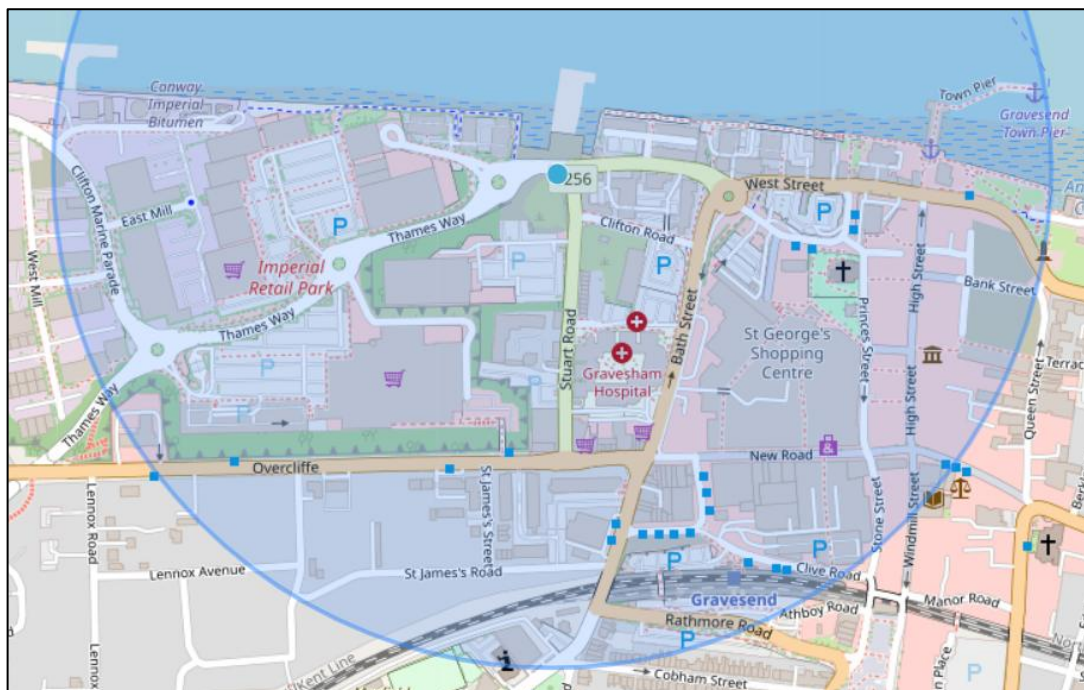
3.2 Transport Context

- 3.2.1 The current NPPF highlights the role of residential developments in ensuring a well-planned and vibrant town centre, while at the same time emphasising that parking guidance should reflect the type and locational context of a site.

² Medway Council ref MC/18/2309

- 3.2.2 The vision-led approach and current planning policy promotes a strategy where sustainable modes should be prioritised over car use. A D&P approach to transport planning means to decide on the preferred future, at this example of the proposed development, and to provide the necessary means to facilitate this future to materialise. As such, providing for car users enhances a motorised movement approach while reduced parking levels would help promote sustainable travel patterns for the future residents.
- 3.2.3 This approach is also consistent with the Draft NPPF (March 2026).
- 3.2.4 The original planning committee report noted that the site benefits from a “*highly sustainable location*” with good access to public transport services on the Fastrack high-quality bus service, and rail services including the High Speed 1 route from Gravesend station. The site is also close to public car parks which occasional visitors can use.
- 3.2.5 As mentioned within the approved Section 73 application, Fastrack was extended in 2021 with an additional route to serve the Amazon site in Dartford. In Greater London, the Elizabeth line opened in 2022, providing access to additional rail destinations as residents from Gravesend can make an easy change onto the line at Abbey Wood station.
- 3.2.6 Together these changes provide increased connectivity through public transport for the site, allowing residents to reach more destinations without the use of cars.
- 3.2.7 **Figure 3.1** below shows that the Fastrack stops, Gravesend railway station and most of the town centre amenities are within 500m radius of the Clifton Slipways site.

Figure 3.1: Site Catchment – 500m

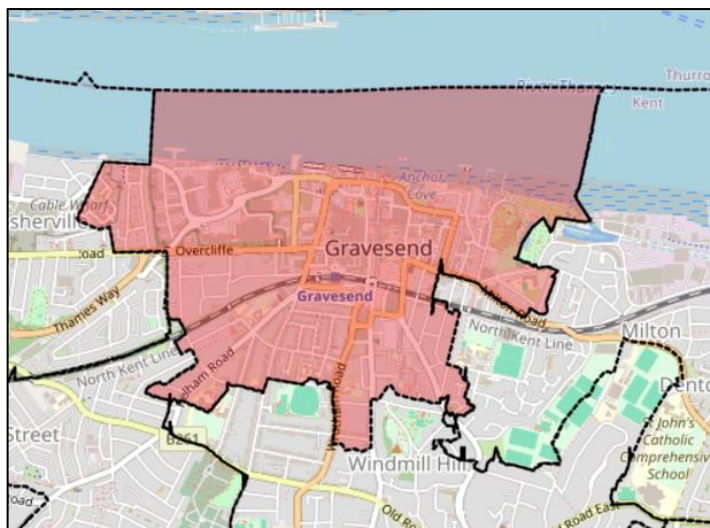


- 3.2.8 Moreover, the proposed development will implement a robust and effective Travel Plan (TP) with the objective of encouraging and supporting sustainable travel and reducing single occupancy car use, building on the fundamental merits of the development site's location.

3.3 Market Context

- 3.3.1 As discussed in the approved Section 73 application, Census 2021 data for the area covering the town centre³ shows that 43% of households do not have a car or van. It should be noted that this data covers all household sizes within the MSOA, and it is more likely that households in flats will be car-free than households in larger family houses.

Figure 3.2: Gravesham MSOA 002



- 3.3.2 This indicates that there is a strong market for housing with reduced parking provision around Gravesend town centre.

3.4 Summary

- 3.4.1 Reduced parking levels would help shape travel patterns away from car trips and promote sustainable forms of travel in line with NPPF's vision-led planning.
- 3.4.2 The excellent public transport provision and current market expectations mean that residential developments in Gravesend can include parking provision well below maximum standards while remaining commercially viable. This is confirmed by the recent planning decisions in Gravesend and adjoining authorities.

³ Census table TS045 - Car or van availability - Gravesham MSOA 002

4 Layout Review

- 4.1.1 C&A have carried out swept path analysis for the revised parking layouts in **Drawing 18-091-012**. This shows that the Stuart Road building layouts would provide sufficient space for cars to manoeuvre in and out of each space. Swept paths are also shown for vehicles entering and exiting the car park, demonstrating that there would be space for cars to wait off the carriageway while the gates open.
- 4.1.2 These plans also show the indicative spaces prioritised for disabled residents.

5 Summary & Conclusions

- 5.1.1 As demonstrated for the permitted scheme, the Clifton Slipways site benefits from a highly sustainable location in Gravesend town centre, with good connections by multiple modes of transport and proximity to public car parks.
- 5.1.2 Travel behaviour has changed in recent years, and this is reflected in current market expectations for new housing in town centres.
- 5.1.3 The proposed changes to the scheme would result in an overall ratio of 0.18 car parking spaces per dwelling. This level is supported by local planning policy and would align with recent planning decisions in Gravesend town centre and elsewhere in Kent.
- 5.1.4 Levels of cycle parking provision have been increased by 20 spaces in the revised scheme, to further enhance and facilitate the sustainable movement envisaged for the development.
- 5.1.5 The Car Club provision in the original and currently approved schemes has been retained and strengthened. This will complement the existing sustainable travel opportunities in Gravesend and provide site residents and the wider community with an alternative to traditional car ownership.
- 5.1.6 The proposals would therefore remain acceptable in relation to transport and highways.

Drawings

