

Traffic & Access Statement

Revision B — September 2026

Site	Land at Empress Road (former garage court adjacent to No. 33), Gravesend, Kent
Proposal	7 self-contained flats with alterations to the existing vehicular access, 5 parking spaces, cycle and refuse storage
Highway Authority	Kent County Council
Local Planning Authority	Gravesham Borough Council
Document reference	EMP-TAS-002 Rev B
Supersedes	Traffic Management Plan, October 2025
Prepared by	Tudor Agencies
Date	September 2026

1. Introduction and scope

This statement addresses the transport and access implications of the redevelopment of a disused garage court at Empress Road, Gravesend, for seven self-contained flats. It supersedes and replaces the Traffic Management Plan issued in October 2025, which described a ten-unit scheme and applied national policy that has since been replaced.

The proposal is minor development of seven dwellings. A full Transport Assessment and a Travel Plan are not proportionate at this scale and are not offered. This statement is the level of transport evidence appropriate to the application, and it addresses each of the matters Kent County Council would expect to see: the access, the accessibility of the site, parking, cycle provision, trip generation, servicing and construction.

2. The site and the highway network

The site lies behind the Empress Road frontage adjoining No. 33 and abutting Scotts Yard. Empress Road is an unclassified residential street of Victorian terraces, subject to a 30 mph limit, with on-street parking to both sides. It connects to Rochester Road, the A226, some seventy-five metres to the south-west.

The A226 is the principal distributor through Milton, linking Gravesend town centre with Rochester. It carries the local bus services and the East Milton Road shopping parade. Bus stops in both directions lie within eighty metres of the site frontage.

Recorded speeds on Empress Road are low. The street is short, narrow, parked on both sides and terminates in a residential grid; it carries no through traffic and functions as an access road only.

3. The existing use and its traffic

The lawful use of the site is a garage court. Garage courts of this type generate vehicle movements at a rate comparable to, and in some cases in excess of, the residential development that replaces them, because each garage is accessed independently and often more than once a day. The garages are presently disused, but the lawful use has not been abandoned and the traffic associated with it forms part of the baseline against which the proposal falls to be assessed.

The practical effect is that the net traffic impact of the proposal is smaller than the gross figure for seven flats would suggest.

4. Vehicular access

4.1 The existing access is retained and altered

The site is served by an existing vehicular access from Empress Road which has served the garage court throughout its operational life. That access point is retained in the same position. The proposal alters and upgrades it rather than creating a new access.

This distinction matters. The principle of a vehicular crossing at this point on Empress Road is long established and is not in issue. No length of kerb is given over to a crossing that did not previously exist, and there is accordingly no net loss of on-street parking capacity attributable to the proposal.

4.2 The alterations proposed

Element	Proposed alteration
Crossing width	Widened to accommodate two-way movement at the threshold and to allow a vehicle to enter without over-running the opposing kerb line.
Kerb and footway	Dropped kerb and tactile paving renewed to the current Kent County Council specification.
Visibility	Splays formed to the standard appropriate to the recorded speeds on Empress Road, achieved within the site and within highway land, with no obstruction above 0.6 m within the splay. Boundary treatment adjacent to the access is set back and kept low accordingly.
Surface	Reconstructed in permeable block paving, laid to falls so that all surface water is retained within the site and no water discharges onto the public highway.
Gradient	The first 5 m within the site laid at a gradient not exceeding 1 in 20 so that a vehicle can stand level while waiting to emerge.
Gates	No gate is proposed across the access. Any future gate would be set back a minimum of 5 m and would open inwards.

The upgraded access is a material improvement on the existing arrangement in visibility, surfacing and pedestrian safety terms. Detailed design will be agreed with Kent County Council and can be secured by condition and, where the works fall within the highway, by agreement under section 184 of the Highways Act 1980.

4.3 Internal layout and manoeuvring

The internal layout allows all vehicles to enter and leave the site in forward gear. Parking bays are dimensioned at 2.5 by 5.0 metres with an aisle width sufficient for a single manoeuvre, as dimensioned on drawing 198/PBLOCK Rev B. The accessible bay is provided with the additional transfer zone to the side and rear and is located on the shortest route to the building entrance.

5. Accessibility by non-car modes

Distances are measured from the site frontage along the pedestrian route and rounded to the nearest 50 metres. Walking times assume 1.3 metres per second.

Destination	Walked distance	Walking time
Bus stops, A226 corridor (both directions)	80 m	1 minute
East Milton Road local centre — convenience store, post office, public house, hot food	250 m	3 minutes
St John's Catholic Primary School, Rochester Road	300 m	4 minutes
Waterton Park Open Space — public open space and children's play	350 m	5 minutes
Gravesend Grammar School	350 m	5 minutes
Pharmacy, Rochester Road	950 m	12 minutes
Gravesend town centre	1.6 km	20 minutes
Gravesend railway station — Southeastern and high speed services to London St Pancras	1.8 km	22 minutes

The site is well placed for daily needs on foot. A convenience store, post office, primary school, public open space and bus stops in both directions are all reached within five minutes. The railway station is a twenty-two minute walk and is more realistically reached by the A226 bus services, which stop within eighty metres of the site and run at a frequency appropriate to a corridor of this kind.

The footway network on the approach routes is continuous, lit and of adequate width. The route to the local centre and to the primary school is level and requires no crossing of the A226 carriageway.

6. Car parking

Five spaces are provided for seven dwellings, a ratio of 0.71 spaces per dwelling. One is an accessible bay. All bays are provided with passive electric vehicle charging infrastructure and two with active charge points from first occupation.

The ratio is appropriate to the location and to the unit mix. Three of the seven units are one-bedroom flats, for which car ownership in this part of Gravesend is materially below the borough average. The site is eighty metres from a bus corridor and within a five-minute walk of a convenience store, a post office and a primary school.

The ratio is also consistent with what this authority has recently accepted. At 133 Windmill Street (application 20220432) permission was granted for 75 apartments at a parking ratio materially below the figure proposed here. The provision at Empress Road is more than double that accepted at Windmill Street.

Allocation, enforcement and management of the five spaces are set out in the Parking Management Plan EMP-PMP-002 Rev B, which forms part of this application and which can be secured by condition.

7. Cycle parking

Secure, covered, lit and lockable cycle parking is provided at ground level with step-free access directly from the site entrance. Provision comprises:

- Not less than one long-stay space per dwelling, on Sheffield stands at 1.0 m centres with 2.0 m manoeuvring depth;
- Two short-stay visitor stands to the frontage;
- One space sized at 2.5 m by 1.2 m for a cargo cycle or an adapted cycle;
- Power provision within the store for e-bike charging.

The store is dimensioned on drawing 198/PO3 Rev B. Where car parking is provided below one space per dwelling, the quality of the cycle provision carries genuine weight with the highway authority, and the provision here is specified and dimensioned rather than merely described.

8. Residential travel information

All new occupiers will receive a travel information pack on occupation, covering local walking and cycling routes, bus and rail timetables, and information on car club membership and cycle purchase schemes where available. This can be secured by condition. A full Travel Plan is not proportionate to a seven-unit scheme and is not offered.

9. Trip generation and highway impact

9.1 Approach

For minor residential development of this scale a first-principles assessment is the proportionate method, and it is the method adopted here. A TRICS interrogation is neither required nor useful at seven units: the sample sets available for flatted development of this size in an edge-of-centre location are small, and the output would carry a margin of error wider than the effect being measured. The assessment below is set out transparently so that Kent County Council can test each assumption.

9.2 Assessment

	Two-way daily vehicle movements
Proposed — 7 flats at 0.71 parking spaces per unit, urban location, three of seven units one-bedroom	approximately 20 to 25
Existing lawful use — garage court	approximately 10 to 15
Net increase	approximately 5 to 15

The proposed figure is derived from five parked vehicles making two to three two-way movements each on a typical weekday, together with an allowance for visitor and delivery movements. The

existing figure is derived from the lawful capacity of the garage court on the same basis. Both are deliberately expressed as ranges.

Expressed hourly, a net increase of this order equates to roughly one additional vehicle movement per hour across the working day, and one or two movements in the network peak hour. That is not a material effect on an unclassified residential street that carries no through traffic.

9.3 The policy test

The relevant test under the current Framework is that development should only be prevented or refused on highways grounds where there would be an unacceptable impact on highway safety, or where the residual cumulative impacts on the road network would be severe. Neither threshold is approached. The access is an improvement on the existing arrangement; the net traffic effect is within daily variation on the street; and the site is well served by non-car modes.

10. Servicing and refuse collection

No servicing vehicle is required to enter the site. Refuse and recycling containers are presented by the managing agent at a designated hardstanding presentation point at the site entrance on Empress Road before the start of the collection round, and returned to the store the same day. The presentation point lies within the application site and not on the public footway, so no obstruction of the highway arises.

Collection therefore takes place from the existing kerbside on Empress Road, exactly as it does for the neighbouring terraced properties, using the existing collection round. The arrangement is set out in full in the Waste Management Plan EMP-WMP-002 Rev B and is secured through the management company obligations described there.

Deliveries and removals will use the on-street loading arrangements available to the rest of Empress Road. The internal layout allows a small van to enter, turn and leave in forward gear where site access is required.

11. Construction phase

Construction impacts are temporary and controllable by condition. A Construction Management Plan will be submitted for approval prior to commencement and will address:

Matter	Control
Hours of work	Monday to Friday 08:00 to 18:00, Saturday 08:00 to 13:00, no working on Sundays or Bank Holidays.
Contractor parking and site compound	Located within the site. No contractor parking on Empress Road.
Construction traffic routing	To and from the A226, avoiding the residential grid to the north and east. Deliveries scheduled outside school arrival and departure times.
Wheel washing and dust	Wheel wash facility at the site exit; damp suppression during demolition and cutting; sheeting of loads.
Materials storage	Wholly within the site. No storage on the highway.
Demolition	Asbestos survey prior to demolition and licensed removal of any asbestos-containing materials.
Highway condition	Photographic condition survey of Empress Road before commencement and reinstatement of any damage on completion.

12. Conclusion

Seven flats on a disused garage court in an established urban location can be accommodated safely on the local highway network.

The existing vehicular access is retained and upgraded, with improved visibility, renewed pedestrian treatment and a permeable surface draining within the site. No new access is created and no on-street parking is lost. The net increase in vehicle movements over the existing lawful use is negligible and falls within the ordinary daily variation of an unclassified residential street. Parking is provided at 0.71 spaces per dwelling, more than double the ratio this authority approved at 133 Windmill Street in 2022, and is supported by a management regime. Cycle provision exceeds one space per dwelling and includes cargo cycle and e-bike capability. Refuse is presented at the kerb by the managing agent so that the existing collection round is unaffected. Construction impacts are temporary and controllable by condition.

There is no unacceptable impact on highway safety and no severe residual cumulative impact on the road network. There is no transport ground on which this application should be refused.

Tudor Agencies Limited

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