

7 Wrotham Road, Gravesend, DA11 0QF

Transport Statement

January 2024



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1. Introduction

1.1 PWLC Projects has been commissioned to provide a Transport Statement in support of a planning application for the change of use from offices to residential dwellings at 7 Wrotham Road, Gravesend, DA11 0QF.

1.2 The property is located on the west side of Wrotham Road, directly adjacent to the junction of Wrotham Road and Cobham Street. The site is situated within Gravesend Town Centre, approximately 150 metres, or a 2-minute walk from Gravesend Railway Station. The site currently comprises of an office use, set over 4 floors (including basement).

1.3 The proposals involve alterations to the property that will see the creation of 13 residential units with car and cycle parking. The site already has Prior Approval for 11 units and the proposal will result in an uplift in the overall number of units from 11 to 13 (two additional units).

1.4 This report is designed to provide commentary on the highways, traffic and transport elements of the proposal, as submitted by the scheme Architect, and will cover the following matters:

- The scheme details in terms of traffic, highways and transportation;
- The suitability of the local road network and supporting transport infrastructure; and
- The specific measures that are to be introduced as part of the scheme to ensure its success.

2. Site Characteristics & Public Transport Accessibility

2.1 – A. Public Transport Accessibility

2.1.1 The site, given its location in the heart of Gravesend, benefits from a good level of public transport accessibility.

2.1.2 Gravesend Railway Station is approximately 150 metres to the north-west of the site. A walking speed of 80 metres per minute is typically considered to be a standard average walk speed for the purpose of calculating the time it takes an individual to access public transport nodes. On this basis, it would take approximately 2-minutes for people to walk to Gravesend Station from the site.

2.1.3 Gravesend Station offers an excellent train service. Fast services run to London St Pancras International in just 23 minutes, whilst there are slower services to London Bridge and London Charing Cross. Gravesend Town Centre bus hub is located approximately 300 metres, or a 4-minute walk, to the north-west of the site.

2.1.4 A location map illustrating the site and the surrounding area is shown in Figure 1 below:

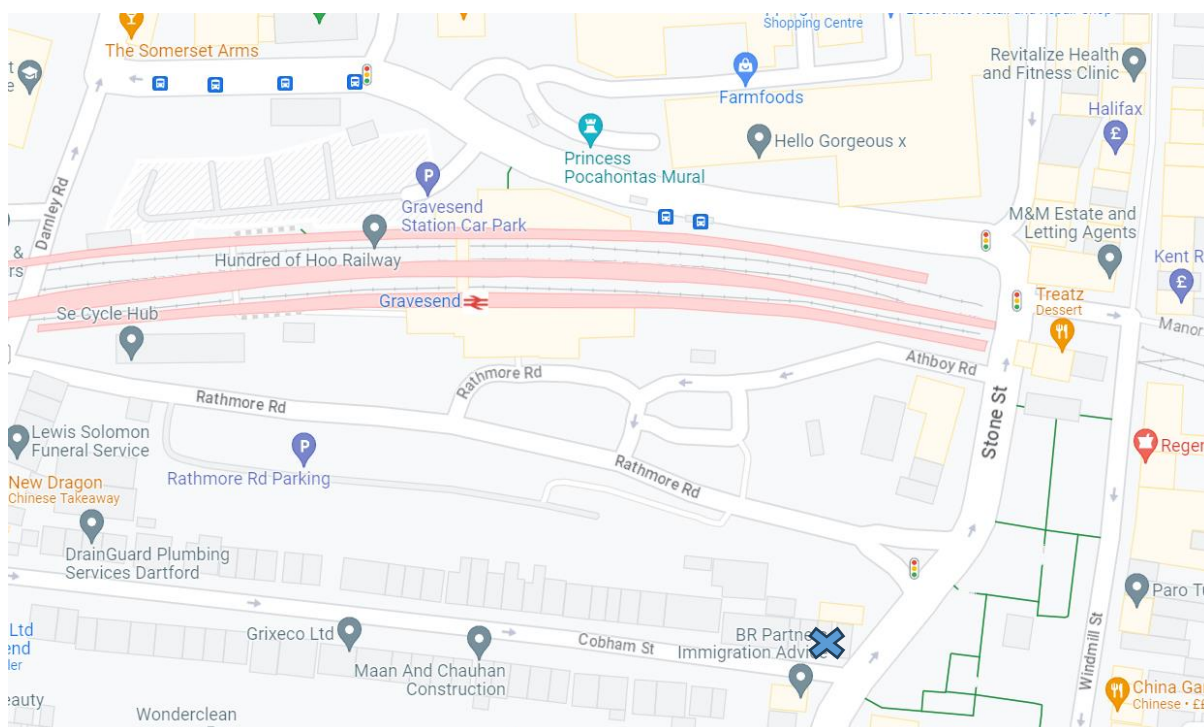


Figure 1 – Location plan showing site (marked by the cross)

2.2 – C. Local Highway Network

2.2.1 As stated, the site is located adjacent to the junction of Wrotham Road and Cobham Street. Wrotham Road is a key distributor route within Gravesend, running north-south and providing a key gateway to and from the A2. Cobham Street is a local access road, running one-way west to east.

2.3 – D. Parking Controls

2.3.1 The streets within the vicinity of the site are located in a Controlled Parking Zone. The Zone is 'D' and operates between Monday and Saturday, 8am – 6.30pm for permit holders & 'pay & display' parking and between Monday and Sunday, 6.30pm – 8am for permit holders only.

2.4 – E. Access to Services and local facilities

2.4.1 The site is located in a central location within Gravesend. Windmill Street, a section of the main pedestrianised shopping street in Gravesend, is located within 160 metres, or a 2-minute walk of the site. Windmill Street, High Street and surrounding roads benefits from all of the shops and facilities associated with a bustling town centre location. The site also benefits from good access to schools, healthcare, supermarkets and the waterfront.

2.5 – F. Car Ownership Levels

2.5.1 The development site is situated in the Pelham Ward, which is part of Gravesham Borough Council. With full neighbourhood statistics yet to be released for the 2021 Census, consideration has been given to car ownership statistics in the 2011 Census, in order to provide an understanding of the anticipated parking impact of the development proposals. Car ownership levels are shown in Table 1:

Car Ownership	Pelham (%)	Gravesham (%)	South-East England (%)
No car	37%	23%	18%
One car	42%	42%	42%
Two cars	15%	26%	30%
Three or more cars	6%	9%	10%

Table 1 – Car Ownership Levels – Ward, Borough and Regional

2.5.2 It can be seen from Table 1 that residential units within the Pelham Ward typically have far lower levels of car ownership when compared to the overall figures for Gravesham. This reflects the highly accessible location, with good access to public transport and local facilities.

3. Policy Context

3.1.1 This section of the Transport Report provides an overview of the transport planning policy guidance in the context of the development proposals for the site. It examines the national, regional and local policies.

3.1.2 The key themes in the relevant national, regional, and local policies are summarised briefly below, and where relevant, policies which relate directly to the proposed development are referenced.

3.2 NATIONAL POLICY

NATIONAL PLANNING POLICY FRAMEWORK (2023)

3.2.1 The National Planning Policy Framework (NPPF) was adopted in September 2023. The NPPF sets out the Government planning policies for England and how these should be applied. It provides a framework within which locally prepared plans for housing and other development can be produced.

In considering development proposals, paragraph 104 of the NPPF states that transport issues should be considered from the earliest stages of plan-making so that:

- a) the potential impacts of development on transport networks can be addressed;*
- b) opportunities from existing or proposed transport infrastructure, and changing transport technology and usage, are realised – for example in relation to the scale, location or density of development that can be accommodated;*
- c) opportunities to promote walking, cycling and public transport use are identified and pursued;*
- d) the environmental impacts of traffic and transport infrastructure can be identified, assessed and taken into account – including appropriate opportunities for avoiding and mitigating any adverse effects, and for net environmental gains; and*
- e) patterns of movement, streets, parking and other transport considerations are integral to the design of schemes and contribute to making high quality places.*

3.2.2 Paragraph 107 states that:

“In setting local parking standards for residential and non-residential development, policies should 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.

3.2.3 Development should only be refused on highway grounds ‘if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on highway safety would be severe’.

3.2.4 Within the context of paragraph 3.2.3, applications for development should:

a) give priority first to pedestrian and cycle movements, both within the scheme and with neighbouring areas; and second – so far as possible – to facilitating access to high quality public transport, with layouts that maximise the catchment area for bus or other public transport services, and appropriate facilities that encourage public transport use;
b) address the needs of people with disabilities and reduced mobility in relation to all modes of transport;
c) create places that are safe, secure and attractive – which minimise the scope for conflicts between pedestrians, cyclists and vehicles, avoid unnecessary street clutter, and respond to local character and design standards;
d) allow for the efficient delivery of goods, and access by service and emergency vehicles; and
e) be designed to enable charging of plug-in and other ultra-low emission vehicles in safe, accessible and convenient locations.

3.3 REGIONAL POLICY

KENT COUNTY COUNCIL

LOCAL TRANSPORT PLAN 4 (LTP4): DELIVERING GROWTH WITHOUT GRIDLOCK 2016 – 2031

3.3.1 Kent County Council’s LTP4 document sets out the Council’s policies to deliver strategic outcomes for transport across the region. It details key transport priorities and longer-term transport objectives.

3.3.2 LTP4 includes the following ambition for Kent:

“To deliver safe and effective transport, ensuring that all Kent’s communities and businesses benefit, the environment is enhanced and economic growth is supported.”

3.3.3 This ambition is intended to be realised through five over-arching policies, as set out below:

Outcome 1: Economic growth and minimised congestion
Policy: Deliver resilient transport infrastructure and schemes that reduce congestion and improve journey time reliability to enable economic growth and appropriate development, meeting demand from a growing population.
Outcome 2: Affordable and accessible door-to-door journeys
Policy: Promote affordable, accessible and connected transport to enable access for all to jobs, education, health and other services.
Outcome 3: Safer travel
Policy: Provide a safer road, footway and cycleway network to reduce the likelihood of casualties, and encourage other transport providers to improve safety on their networks.
Outcome 4: Enhanced environment
Policy: Deliver schemes to reduce the environmental footprint of transport, and enhance the historic and natural environment.
Outcome 5: Better health and wellbeing
Policy: Provide and promote active travel choices for all members of the community to encourage good health and wellbeing, and implement measures to improve local air quality.

3.4 LOCAL POLICY

GRAVESHAM LOCAL PLAN CORE STRATEGY (ADOPTED SEPTEMBER 2014)

3.4.1 Gravesham Borough Council’s Local Plan sets out policies and proposals that will be used to guide decisions and investment on development and regeneration in the area over the period to 2028. It sets out how and where the homes, jobs, community facilities, shops and infrastructure will be delivered and the types of places and environments the Council wants to create.

3.4.2 Saved Policy T1 states that the Local Planning and Highways Authority will consider the impact on the transport system and the environment of traffic generated by the new development. The increase in the number of units would have a negligible impact on the local area, with traffic movements and parking requirements remaining below the equivalent office use, even accounting for the extended floorspace.

3.4.3 Saved Policy P3 states that the Council will expect development to make provision for vehicle parking in accordance with Kent County Council Vehicle Parking Standards, unless justified as an exception. Such exceptions include development in central Gravesend. Furthermore, Saved Policy P5 states that where the provision of parking would lead to a building being unused or underused the Council will consider a relaxation of standards, providing it does not exacerbate on-street parking problems in the area.

3.4.4 Transport is also covered under Policy CS11. The following paragraphs are most relevant to the current development:

New developments should mitigate their impact on the highway and public transport networks as required. As appropriate, transport assessments and travel plans should be provided and implemented to ensure the delivery of travel choice and sustainable opportunities for travel. Transport assessment work is required to be undertaken in accordance with national and local policy guidance, and to identify detailed highway and public transport network requirements and management arising from the development.

Sufficient parking in new development will be provided in accordance with adopted parking standards which will reflect the availability of alternative means of transport and accessibility to services and facilities.

3.4.5 The Council will require applicable new developments to prepare and adopt Transport Assessments and Travel Plans using Kent County Council's guidance "Transport Assessments and Travel Plans, October 2008." It will also require developments to take into account current car parking standards.

3.4.6 Currently, the Council uses the Kent Vehicle Parking Standards which it adopted in July 2006 as Supplementary Guidance. This recognises that the control of parking at new developments is one way of promoting more sustainable forms of transport. It also recognises that parking takes up a large amount of space and has a direct influence on the efficiency of land

use, the density of development achieved and its cost. The Parking Standards document states that the parking provision determined for a development should follow an assessment of the travel options by all types of transport that are already available or that can be provided.

3.5 LOCAL POLICY

SUPPLEMENTARY PLANNING GUIDANCE 4: KENT VEHICLE PARKING STANDARDS (2006)

3.5.1 The following paragraphs from the above document are relevant to the proposed development:

The control of parking at new developments and at extensions to existing buildings, is one way of promoting more sustainable forms of transport. Parking also takes up a large amount of space and has a direct influence on the efficiency of land use, the density of development achieved and its cost.

Kent Vehicle Parking Standards provide a consistent approach to parking provision. Developers and local planning authorities should:

- *Ensure that levels of parking provision will promote sustainable transport choices and a more sustainable form of development;*
- *Encourage the shared use of parking where appropriate;*
- *Require the provision of parking spaces for the mobility impaired;*
- *Require the provision of convenient and safe cycle parking;*
- *Consider appropriate parking provision for powered two-wheeled vehicles;*
- *Consider the accessibility and permeability of developments by pedestrians and public transport.*

Economic factors, transport needs and levels of accessibility vary considerably in Kent and there will be situations in which the local planning authorities will need to depart from the standards to reflect local circumstances. The Kent Vehicle Parking Standards are not intended to be restrictive. The parking provision determined for a development should follow an assessment of the travel options by all modes of transport that are already available or that can be provided.

3.5.2 For residential developments, parking standards are set as ‘maximums’, based on the following table:

Maximum Vehicle Parking Standards

Car Parking	
1 bedroom	1 space per dwelling
2 and 3 bedrooms	2 spaces per dwelling
4 or more bedrooms	3 spaces per dwelling
Sheltered Accommodation	1 space per resident warden + 1 space per 2 units
Notes:	1. For 1-bedroom dwellings the parking will usually be provided as communal spaces. For other dwelling sizes part or all of the parking can be provided on a communal basis. 2. The level of car parking provision includes any garages, provided as an integral part of the dwelling or within its curtilage, and/or driveways provided within the curtilage, subject to the preferred sizes set out in Appendix B.

3.5.3 In addition, the document provides the following additional guidance:

Within developments of varying dwelling size provision should be established initially on the basis of the size mix of the units proposed. Subject to discussion with the local planning authority there may be scope in mixed developments, particularly at higher densities, for sharing of car park spaces resulting in lower overall provision than implied by application of the standards for each dwelling size category. More stringent standards may be acceptable to developments in town centres.

3.5.4 Cycle parking standards are based on the following table:

Minimum Cycle Parking Standards

Individual residential dwellings ⁽¹⁾	1 space per bedroom
Flats & maisonettes ⁽²⁾	1 space per unit
Sheltered accommodation ⁽²⁾	1 space per 5 units
Notes:	1. Cycle parking provision should normally be provided within the curtilage of the residential dwelling. Where a garage is provided it should be of a suitable size to accommodate the required cycle parking provision. 2. Parking provision should be provided as a secure communal facility where a suitable alternative is not available.

3.6 KENT DESIGN GUIDE REVIEW: INTERIM GUIDANCE NOTE 3: RESIDENTIAL PARKING (2008)

3.6.1 The following paragraphs from the above document are relevant to the proposed development:

“This Guidance Note relates primarily to development proposals involving new streets and places. The Guidance Table can be applied to minor (often infill) developments, but regard needs to be had for the severity of concerns about safety and/or amenity before recommendations of refusal are made in respect of numerically “inadequate” parking. Unless demonstrable harm is likely to be caused, it may be inappropriate to make such recommendations.”

“All parties involved in the design and assessment of new developments should be following current guidance by identifying parking provision that satisfies reasonable demand, is well-designed and makes the best use of the land available.”

3.6.2 As stated *“Location has a significant influence on vehicle ownership”. “Tenure is also relevant”,* with houses having *“higher vehicle ownership levels than flats.”* The policy also endorses non-allocated private parking.

3.6.3 Residential car parking should be provided at a maximum of one off-street space per unit based on the proposed unit mix and edge-of-centre location.

3.7 KENT DESIGN GUIDE: MOVEMENT & CONNECTIVITY: PARKING STANDARDS (2022)

3.7.1 The ‘Interim Guidance Note 3: Residential Parking’ has been in place since 2008 and during the intervening period the approach to parking at both national and local level has changed considerably. This updated version of the Parking Standards document helps address some of the developments in parking policy that have occurred in the last 15 years.

3.7.2 The updated document states, *“Residential parking is not just a ‘numbers game’. The parking provision should satisfy reasonable demand bearing in mind the location, be well designed with useable spaces and make the best use of the land available.”*

3.7.3 The updated Design Guide goes on to state:

“Parking relies upon robust and thoughtful design. Parking provision should be an integral part of the design of the development and considered at an early stage in the planning process. It is important that the amount, location, and critically, the layout of residential parking is appropriate to the development, for the benefit of future residents.”

3.7.4 Residential cycle parking should be provided at a minimum provision of one space per unit.

The document also offers the following guidance:

Cycles

The provision of secure and convenient cycle parking is essential to encourage people to cycle. It is essential that cycle parking is designed into a development at an early stage, prior to the granting of planning permission to ensure it relates well to the development.

3.7.5 Residential car parking should be provided at a maximum of one off-street space per unit based on the proposed unit mix and edge-of-centre location. As stated in the footnotes to ‘Table 1: Residential Car Parking Standards’, reduced levels of provision are supported where effective mitigation measures are in place including Controlled Parking Zones, the availability of sustainable transport modes and car clubs.

4. The Development Proposals in Highways & Transport Terms

4.1 Overview

4.1.1 The proposals involve a planning application for the change of use from offices to 13 residential units. The development will include 8 x 1 bedroom and 5 x 2 bedroom units.

4.2 Vehicle & Bicycle Parking

4.2.1 The development will incorporate 4 off-street car parking spaces. The car park was previously used by the offices and the development will formalise arrangements to provide a more efficient layout for off-street parking and turning. One off-street car parking space has been removed when compared with the recent Prior Approval application, to maximise space for cycle parking and refuse & recycling provision. Vehicles will continue to use the existing access via Cobham Street at ground floor level to enter and exit the car park.

4.2.2 The applicant will allocate the off-street car parking spaces to specific units within the development and is happy for a planning condition to be included to this effect. Parking matters are considered in further detail in Section 5.

4.2.3 In terms of cycle parking, covered and secure bicycle storage will be provided at the rear and side of the building, as shown on the application plans. This will provide access to a total of 16 cycle parking spaces. This level of provision accords with the most recent standards from Kent County Council.

4.3 Delivery & Servicing Management

4.3.1 The modest nature of the development will help minimise any issues associated with deliveries and servicing. Larger delivery vehicles will be able to service the site directly from Wrotham Road or Cobham Street.

4.3.2 A domestic residential bin and recycling storage area will be located to the rear of the site. Bins will be moved to the junction with Cobham Street on collection days.

4.4 Trip Generation

4.4.1 As identified in Section 2, the site is well located for public transport services and local facilities. Based on the modest nature of the development, the trips generated by the development are not expected to result in any material effects on the local transport network.

4.4.2 The extant use of the site contains circa. 600 square metres of office floorspace (excluding the basement office areas). Under the extant office use scenario, an office employee typically requires up to a maximum of 10 square metres of office space. On this basis, an office of 600 square metres could comfortably accommodate up to 60 staff.

4.4.3 According to the '*Method of Travel to Work*' data for the Pelham Ward, collected as part of the 2021 Census, 39% of the working population typically travel to and from work as a car driver. On this basis, and under the scenario of an office use, approximately 23 staff vehicles could potentially be expected to drive to and from the site each day, with such movements typically undertaken during the network peak periods.

4.4.4 A development of 13 residential developments will have significantly less of an impact than the extant use in terms of vehicle movements to and from the site.

5. Parking Impacts

5.1 Car parking and associated impacts;

5.1.1 With respect to car parking, the development will be provided with 4 off-street car parking spaces for the 13 residential units.

5.1.2 As stated in Section 2, the site is located within the heart of Gravesend and there are several local factors that will help safeguard residential parking amenity and encourage sustainable travel behaviour amongst residential occupiers, namely:

- Gravesend Railway Station is approximately 150 metres from the site, an easy walking distance for the majority of station users. The station provides a high-speed and high-quality service to a number of key employment and leisure destinations. There are also bus stops within a 4-minute walk of the site;
- The availability of a range of town centre shops and community facilities within a short walk of the site;
- The site is located in an existing Controlled Parking Zone operating between Monday and Sunday. To use the parking bays within the hours of controls one must either purchase a parking permit or display a parking ticket. The presence of a CPZ will help reinforce sustainable travel patterns amongst residents and visitors;
- 62% of the units within the development are 1-bedroom units.

5.1.3 The National Planning Policy Framework advises Local Authorities to use parking policies to promote sustainable transport choices and reduce the reliance on the car for work and other journeys. Kent's Local Plan and Gravesham's Development Plan policies endorse such an approach.

5.1.4 Based on car ownership levels in the Pelham Ward, as identified in the 2011 Census in Table 1, a development containing 13 residential units would be expected to generate up to 12 residential vehicles. However, such an assessment fails to account for the site-specific factors in relation to this proposal that are anticipated to result in far lower levels of car ownership.

5.1.5 Firstly, it is also important to acknowledge that car ownership levels for flats are well below that of houses, indeed car ownership for flats fell between the 2001 and 2011 Census. Furthermore, the 2011 Census is now more than 10 years old, and the attitude towards car use has changed over that time. There has been a significant increase in the awareness of climate change, many councils have declared a climate emergency, with continued awareness of air quality issues. Local Council's and the Government are promoting active travel and encouraging people to make the right choices when considering their mode of travel.

5.1.6 Whilst the site is located outside of London, the Travel in London Report 12 Figure 4.24 provides a useful reference point as to how car ownership levels have changed over time. Figure 2 shows that households with no car have increased and households with either one car or two plus cars have both reduced since the 2011 Census (see Figure 2). This is further evidence of this downward trend and likely to be reflected in the 2021 Census data once this level of granularity is released.

Figure 4.24 Proportion of households by car ownership and household income, LTDS 2008/09-2018/19.

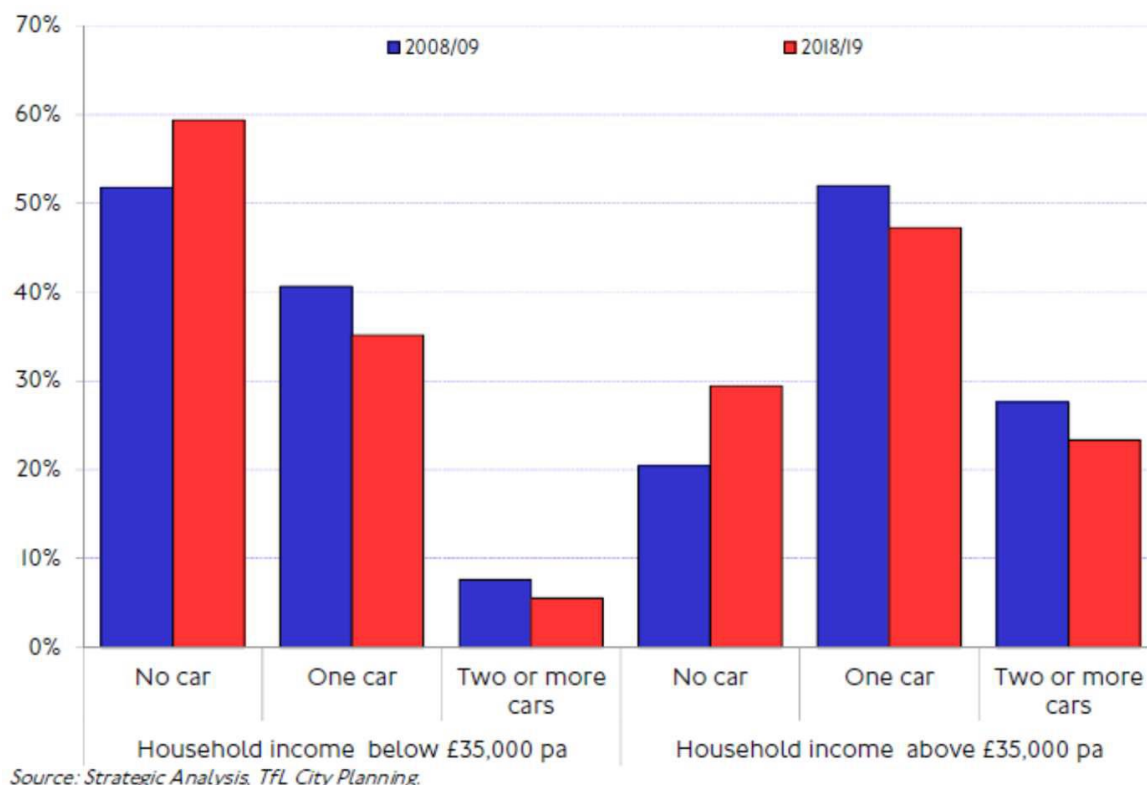


Figure 2: Proportion of households by car ownership and household income, LTDS 2008/9 – 2018/19

5.1.7 Based on the nature and location of the development, along with the evidence of reducing levels of car ownership, it is considered reasonable to assume that the provision of 4 off-street car parking spaces will be sufficient to satisfy the level of parking demand from the development without having a significant impact on highway safety or residential parking amenity.

5.1.8 The recent application to convert the office building to residential use under Prior Approval noted that no parking was required for development in this town centre location. It was therefore found that there was, if anything, an overprovision of parking, with 5 off-street spaces serving 11 flats. This was considered acceptable provided the space were allocated and that the correct level of cycle parking was delivered, with the proposed cycle parking requested to be moved from the front of the building to the rear car park. The effect of this is to lose one of the 5 parking spaces. The development will now provide 4 allocated off-street parking spaces and 16 secure cycle parking spaces for 13 units. This is considered to be appropriate to the location.

6. Summary & Conclusions

6.1 PWLC Projects has been commissioned to undertake a Transport Statement in relation to the proposed residential development at 7 Wrotham Road, Gravesend, DA11 0QF. It is considered that the scheme as submitted meets all the traffic and transportation requirements expected from a sustainable residential development within Gravesham Borough Council.

6.2 A railway station within a short walk of the site, access to local bus routes and good access to town centre shops, amenities and a range of community facilities will help minimise the transport impact associated with the development. Such facilities, combined with an off-street car park and the presence of a Controlled Parking Zone in the area, will ensure that the traffic generation and parking impact associated with the development is low and will not have a material effect on the surrounding highway network.

6.3 Access and cycle parking arrangements associated with the development have been designed in accordance with local policy and guidance.

6.4 In summary, the main points of the application in terms of highways and transport are:

- A development which reduces non-essential car movements and the impact of travel in line with national, regional and local policies and aspirations;
- The provision of a scheme that does not have a material impact on traffic generation / highway safety;
- The provision of a scheme that does not have an impact on parking efficiency within the vicinity of the site;
- The access to Gravesend railway station within walking distance of the application site;
- The access to bus services within walking distance of the application site; and
- The good access to town centre shops / amenities / community facilities within walking distance.

6.5 In conclusion, the application proposals have been designed in transport terms to meet national, regional and local policies, and satisfy the standards and aspirations for sustainable travel within new developments.