

**Gravesham Borough Council**

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**Highways and Transportation**

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**Tel:** 03000 418181

**Date:** 25 September 2025

**Our Ref:** AC

<b>Application -</b>	<b>GB/20250802</b>
<b>Location -</b>	<b>Blackthorn Farm, Wrotham Road, Meopham, Gravesend Kent</b>
<b>Proposal -</b>	<b>Outline planning application for up to 100No. residential dwellings (including affordable housing), with all matters reserved except for access and creation of a new access from A227/South Street.</b>

Thank you for your consultation in relation to the above planning application. KCC highways has the following comments to make with respect to highway matters:

**The Site**

The existing site is located to the east of the A227 South Street and south of Heron Hill Lane in Culvestone Green, Gravesham. It is currently formed of open fields and vegetation.

**Proposal**

The proposal is for approximately 100 dwellings; 50% private and 50% affordable.

The vision of the site is to *“Provide a sustainable extension to Culverstone Green located within close proximity to everyday services, facilities and public transport nodes both within the wider village of Meopham, nearby Snodland to the east and Gravesend to the north. This is to ensure their ongoing viability and to promote and enable non-car accessibility and social inclusion among future residents.”*. Whilst this vision is supported, it is unlikely that it can be realised in this location with the existing facilities.

**Access**Vehicles

The access proposals can be seen on plan H-01 Rev P1 in Appendix H of the Transport Assessment GS/TV/35076 version 2.0 dated 30.06.2 (TA).

All mode access is proposed to be taken from the A227 South Street, with an additional 3.7m wide emergency access with collapsible bollard provided further south, also onto the A227, providing additional pedestrian and cycle access. The existing vehicle access will be stopped up. The principle of the access proposals is acceptable.

However:

- The plans do not show the land ownership and highway boundary extents and whilst there is unlikely to be issues with third party land, the plans should be updated to confirm this.
- It is unclear why the access has a taper.

- The plan shows existing vegetation to be removed and it is unclear if the vegetation is on highway land or within the site boundary. KCC do not usually permit the removal of trees on highway land for new development and therefore this must be clarified.
- No lighting proposals are shown; will the access be lit?
- Paragraph 3.2.1 states *“Upon entry to the site, the access will have a 6.0m carriageway width, reducing to 5.5m internally.”* However, plan H-01 Rev P1 shows a 5.5m carriageway, so it is assumed the text is incorrect.

Visibility splays are also shown on plan H-01 Rev P1 in Appendix H of the TA. However, the plan needs to be updated to show the highway boundary and land ownership information in order to demonstrate the splays lie wholly within these areas.

A stage 1 Road Safety Audit and Designer's Response have been undertaken for the site access. The audit raised two issues - traffic speed past the access and lack of tracking showing vehicles entering and exiting the site. The Designer's response proposed to address these issues by following the auditor's recommendations and providing a vehicle activated sign (VAS) or gateway feature, and vehicle tracking. However, no proposals are shown on the off-site improvements plan. KCC would have concerns with a proposal for a VAS or similar, as it is questioned whether it would be successful in reducing speeds to 30mph in this particular location and they have a limited shelf life so it would be a future maintenance liability for KCC.

Vehicle tracking at the site access using an 11.3m refuse vehicle and 7.5T box van is shown on plans T-01 Rev P1 and 02 Rev P2 and is acceptable.

Paragraph 2.3.4 of the TA states *“There is no dedicated cycle infrastructure within the site vicinity, which is representative of the site's rural location. Many local roads are however considered suitable for cycling by competent individuals in view of their generally low-speed, lightly trafficked nature.”* However, paragraph 3.2.2 states that an automatic traffic count (ATC) was undertaken in March 2025 in the vicinity of the access (within the 30mph zone), and that 85th percentile speeds were recorded as *“39.1mph northbound and 37.8mph southbound.”*, 9mph above the speed limit. The turning movements shown in Appendix P of the TA show approximately 1200 vehicles travelling along the A227 in each peak period. This evidence directly contradicts the statement regarding the 'low speed' and 'lightly trafficked' environment, and raises highway safety concerns. The proportion of HGVs is not shown and is required, as this could also impact on the attractiveness of walking and cycling.

### Walking and Cycling

In line with the KCC Transport Assessment and Travel Plan Guidance, Active Travel England advice and LTN 1/20, routes used by pedestrians and cyclists should be direct, well connected, well lit, attractive and overlooked. There is concern that whilst this may be achievable on the site itself, the existing infrastructure does not meet standards now required by policy and guidance.

Regarding Gravesham Borough Council's (GBC) LCWIP, paragraph 2.3.6 of the TA states *“Although the link between Istead Rise and Meopham was not identified as one of the main corridors and therefore not part of the LCWIP, it is noted as a key route locally. Stakeholder engagement highlighted a strong desire locally to create a dedicated cycling link between the two settlements. It is noted that GBC are keen to progress this route outside of the LCWIP due to public support”*. As far as KCC are aware there are no proposals for this route and no funding allocated. This highlights the issue of development in rural areas where it is often incredibly difficult to provide sustainable infrastructure that meets today's standards.

The consultant undertook a walking and cycling audit of the existing local area on 23rd April 2025, following a request by KCC. This is welcomed.

The audit results for the area north of the site are summarised in Table 2-4 '*Route North of the Site Compliance with Key Audit Points*'. Whilst not mentioned in the text of the TA, approximately 70m to the north of the site the speed limit on the A227 changes from 30mph to 40mph. This can be seen in Figure 2-8 '*Crossing Facilities at Ridley Turning Bus Stop*'. Here, there is no separation between footway and carriageway and the dropped kerbs required to cross to the western side of the A227 to continue north, are located within the 40mph section. There is no street lighting to assist this crossing and as the audit highlights, no tactile paving. Whilst the applicant claims there is no vegetation encroaching onto the footway, Figure 2-8 shows that it is, on the left-hand side of the photo (eastern side of the A227) and is emphasised by the setback location of the posts and bollards. It is very unlikely the useable footway is 2m in this location. A site visit was undertaken by a KCC highways officer on 29th May 2025. During the site visit the vegetation was observed to be encroaching onto the footway, reducing the effective width.

The audit states this section is overlooked by properties, but this is disputed, as whilst someone waiting at the southbound stop may be overlooked by the residents of the house on the corner of Chapman's Hill, the rest of the route, particularly the western side of the A227 and at the northbound bus stop, is not. It is likely to be very dark waiting at either stop at night, but particularly during the winter months.

It is acknowledged that the route to the south of the site to the primary school is a betterment when compared to that of the north. However, there is still limited street lighting along the route. The site access plan H-01 Rev P1 in Appendix H of the TA shows a proposed 2m footway tying into the existing footway. However, the existing footway it ties into is significantly narrower than the proposed, contradicting the statement that the footways along the A227 are 2m wide. As a minimum, the applicant should ensure a 2m footway is provided along the site boundary with the A227.

The audit summary states that side roads have appropriate dropped kerbs but no tactile paving, which compromises safety and accessibility. However, the audit has not referenced Whitepost Lane (which is on the direct route to the local shop), which has guard railing installed (presumably due to the lack of visibility for crossing south – north across Whitepost Lane) but still has a dropped kerb directing pedestrians into the road, and no dropped kerbs on Whitepost Lane. This should be reviewed and improvements proposed.

With regard to cycle parking at key destinations, the audit states the primary school has five cycle parking spaces. According to the Government website, the school has a capacity of 210; assuming the five spaces provide for ten cycles, these spaces equate to a provision of less than 5% of the students. This suggests either not many children cycle (and it is considered whether this is due to the existing infrastructure in the area), or the school has a higher demand but has not increased provision. The former would further evidence the lack of appropriate facilities in this area to cater for new development. The audit does not state whether cycle parking is available at the other local facilities noted in Table 2-2, including the convenience store, pub, restaurant and playing fields. If parking is not available, how can residents be encouraged to cycle?

With regard to whether seating and shade is available on the route to allow people (particularly older or less able -bodied people) to rest, the audit states "*There is seating available at the School bus stop*". However, the KCC site visit revealed the seating is badly damaged with several pieces of wood missing and contains no shade. No proposals have been put forward to improve this.

At section 3.3 the applicant proposes to enhance the pedestrian network through the provision of tactile paving, and refreshing the red surfacing on the carriageway. This is welcomed.

However, these proposals do not mitigate the issues set out above and below and do not address the recommendations of the safety auditor, which were deemed to be critical to addressing safety risks.

#### Public Transport

The nearest bus stop is located 150m north of the site on the A227, which is within an acceptable distance to serve the site. However, the services are severely lacking and the infrastructure could be improved.

The southbound bus stop does not have a shelter and the footway looks narrow in this area, potentially making it difficult for other pedestrians to pass waiting passengers. This area of the A227 is not lit with streetlighting and would therefore not be attractive, particularly during the winter months when it is dark before the PM peak period, and possibly in the AM peak. During pre-app, the applicant proposed to provide a bus shelter for the southbound stop but this no longer forms part of the proposals. No explanation has been provided as to why the offer has been rescinded.

Table 2-1 '*Bus Services Available From 'Ridley Turning' stops*', shows that whilst there are six school services, there is only one regular weekday service that serves this stop – the 308. The 308 provides only seven services a day from this stop, between 10:04 – 18:31. Therefore, there is no commuter service in the AM peak to provide access to wider public transport connections such as Meopham Railway Station, Gravesend Railway Station, Ebbsfleet Railway Station or Gravesend bus hub, and there are limited PM peak hour services. No information has been provided regarding weekend services, so it has to be concluded that there are no buses serving these stops on a weekend. If this assumption is correct, how would residents access areas outside Culverstone Green during the weekend?

It should be noted that the 308 requires subsidy as it is not commercially sustainable based on existing usage and passenger fares alone.

The site needs to be served by high frequency public transport that provides access to appropriate destinations, in order to encourage modal shift away from the private car. The existing service is not sufficient.

Meopham Railway Station is located approximately 4.7km to the north of the site. There is no morning peak hour bus service running between the site and the station, and no dedicated cycle route. This, along with the lack of street lighting along parts of the A227, the presence of HGVs and vehicle speed issues, mean cycling is unlikely to be an attractive option without significant infrastructure improvements.

Table 2-2 '*Facilities and Services Local to Proposed Site*' sets out the facilities available within a 23-minute walk of the site. This includes a nursery and a primary school, but no information has been provided to demonstrate there are enough places available for the new children to enrol. If the school or nursery are often oversubscribed, the residents will have to travel elsewhere for these facilities and given the distance, the lack of cycling infrastructure, lack of street lighting etc, these trips would likely be made by car.

Paragraph 2.5.5 of the TA states "*A wider range of services and facilities are available in Gravesend, approximately 10km north of the site and accessible via a direct bus service on the 308 bus. Services and facilities include, but are not limited to - shops, supermarkets, doctors surgeries, schools, employment opportunities and leisure centres.*" As set out in the TA and discussed above, the 308 is not a high frequency service. Paragraph 2.6.14 states "*Additional everyday services and facilities are located via a short drive or bus journey to Gravesend.*" Given the distance to, and lack of bus provision to and from the site for access to these uses,

the residents are realistically going to have to make the 'short drive' and it is therefore questioned how the site can be considered sustainable.

During pre-app KCC requested a review of whether reasonable accessibility by non-car modes is achievable to the most common workplace locations. This has not been provided. Based on the information provided within the TA (significant distance to the train station, no cycle lanes along the busy A-road, speeding traffic, no bus provision during the AM peak hour and limited frequency during the day), and the fact that the Census data in Appendix M shows only 4% of people work in the local area (Gravesend 012), it can therefore only be concluded that there is not reasonable accessibility to popular work places by non-car modes. Again, these trips are therefore likely to have to be made by car.

### **Crash Data Assessment**

A crash data assessment has been undertaken for the local area and KCC agree with the conclusions.

### **Parking**

As the application is Outline except for access, parking provision is not set out in detail. However, the provision set out at section 3.5 is considered to be reasonable and is unlikely to result in any impact on the local highway network. It is noted that KCC do have concerns with all of the allocated provision being provided in tandem formation, although this issue can be discussed during the Reserved Matters stage, should the application be permitted.

Electric vehicle charging infrastructure will be provided in line with the Building Regulations, which is welcomed.

### **Trip Generation and Distribution**

In order to anticipate the number of trips the site will generate, a TRICS trip rate assessment has been undertaken using both the 'Houses Privately Owned' and 'Affordable / Local Authority Houses' categories, with a 50% / 50% split being allocated. It is noted that the 'Houses Privately Owned category' can include up to 25% of affordable units and therefore there is a chance that the applicant has slightly underestimated the trip generation to and from the site. However, applying the 'Houses Privately Owned' trip rates to 100% of the units would result in the addition of eight vehicles in the AM and six vehicles in the PM and is therefore not considered to be significant. The assessment shows the development is likely to generate approximately 40 two-way trips in the AM peak and 42 two-way trips in the PM peak. This level of trips is considered to be typical of a development of this size.

The applicant has added a 5% reduction to the forecast trips, accounting for the 'vision'. However, this is not agreed as the majority of the privately owned sites assessed in TRICS already had a Travel Plan in place, and other than introducing tactile paving and refreshing carriageway markings there are no measures proposed which are likely to generate an additional reduction. Applying a 5% reduction instead of the typical 10%, also suggests that the potential for mode shift is low.

Trip distribution has been based on 2011 Journey to Work Census data, which is now 14 years old. However, it is recognised that in this location, where there has been little development since the Census was taken, this is likely to remain the most suitable method of distribution. Excluding the 5% reduction, the development is predicted to generate a maximum of 30 trips to the north and 14 trips to the south, during each of the peak periods. This level of traffic generation is unlikely to have a significant impact on the local highway network capacity in this area.

## **Junction Capacity Modelling**

The site access junction has been modelled for capacity using appropriate modelling software. However, it is unclear why the diagram shows the A227 as the minor arm (and whether this impacts the results), how the 'warnings' have been addressed, and why the full Junctions outputs have not been provided in Appendix Q. The results of the modelling show the junction is anticipated to operate well within capacity, therefore, subject to the above clarifications, this is acceptable.

## **Policy**

Table 4-1 sets out a number of planning policies relevant to the Application, and how the proposal is compliant.

With regard to the National Planning Policy Framework (NPPF), and particularly policies 110, 148 and 155, the compliancy stated within the TA is questioned. Whilst the site is within walking distance of some local facilities, these are limited and the report recognises that more facilities (such as a supermarket and GP) can be accessed by car. The lack of appropriate bus services serving the site, the excessive speeding of vehicles along the A227 and lack of street lighting along sections of the A227, is a direct contradiction of the statement that there is a "*genuine choice of sustainable mode*" available. It is also unclear how the Travel Plan will further encourage sustainable travel if the infrastructure and services required to encourage sustainable modes, are not provided. The introduction of tactile paving and paint refresh will assist, but does not go far enough to accord with policy.

KCC's Local Transport Plan 5 (LTP5) promotes reducing car dependency and increasing active travel and public transport. Rural developments that rely heavily on car travel conflict with this aim. The plan stresses the need for integrated transport networks. Isolated rural sites without access to a reasonable level of public transport or safe walking and cycling routes are inconsistent with this vision.

GBC's Core Strategy paragraph 2.6.4 (which is not referred to in the TA) states "*In view of these challenges and opportunities, there will be a need to ensure that: • new development is mixed use, is located in areas with best access to services and facilities which minimise the need to travel, particularly by car and minimises impacts on the road network; and • support is given to alternatives to car based transport such as improved bus, train, cycling, walking and river transport provision and improved transport hubs in Gravesend town centre and at Ebbsfleet;*". Proposals in remote areas lacking infrastructure conflict with this statement.

With regard to the Department for Transport's Circular 01/2022, paragraph 12 is quoted in the TA as stating "*Where such development has not been identified in an up-to-date development plan (or an emerging plan that is at an advanced stage), developers should demonstrate that the development would be located in an area of high accessibility by sustainable transport modes...*". This site is not allocated in the GBC Core Strategy, was not included in the Reg 18 stage 2 Local Plan consultation and it is not considered to be located "*in an area of high accessibility by sustainable transport modes.*"

The policy summary states that "*The proposed development is seen to comply with all relevant national and local transport planning policies. The site enjoys good access to the primary and strategic highway network and is located within a reasonable walking distance of a range of services, facilities and public transport nodes, providing residents and visitors with realistic opportunities for non-car travel, in accordance with Paragraphs 110, 115, 148 and 155 of the NPPF. Sustainable travel will be further encouraged by the proposed enhancements to surrounding pedestrian infrastructure and the future Travel Plan, a draft version of which has been submitted alongside this Transport Assessment.*"

KCC disagree that the site is in accordance with current policies, including the NPPF.

### **Travel Plan**

The submission of a draft Travel Plan (Ref GS/TV/35076, dated 30.06.25 version 2.0) is welcomed.

The 'vision' set out at paragraph 1.7.1 is to *"provide a sustainable extension to Culverstone Green located within close proximity to everyday services, facilities and public transport nodes both within the wider village of Meopham, nearby Snodland to the east and Gravesend to the north"*. Paragraph 1.7.2 states *"This TP will play a critical role in the achievement of this vision by promoting the options for – and benefits of – sustainable travel"*. However, it is unclear how sustainable connections can be made to other areas including Snodland, given the significant distance between the two areas, the lack of footways, the lack of lighting and the fact that no buses run directly between the site and Snodland.

The text relating to access to and from the site by the various modes, and the section relating to the local amenities, is similar to, or the same as that in the TA. Therefore, the issues set out above also apply to the Travel Plan.

Whilst paragraph 3.2.1 shows an existing 9% mode share for rail generated in Gravesham 013, it does not provide a plan showing the extent of Gravesham 013 (which may be located closer to the station than the proposed site), nor does it determine whether residents are driving to the station, meaning they are still reliant on the private car. Paragraph 3.2.2 states *"...Residents within MSOA Gravesham 013 have a 75 per cent car driver mode share for journeys to and from work."* However, this statement has failed to acknowledge the 4% of 'passengers' who are also travelling by private car.

Paragraph 3.3.1 refers to *"realistic targets"* and paragraph 3.3.3 sets out a target of *"A minimum of ten per cent reduction in single occupancy car travel."* It is unclear how a 10% reduction in car based trips is realistic given the issues outlined in this response and lack of new measures proposed. This also contradicts the 'vision' which refers to a 5% reduction.

### **Conclusion**

The proposal raises highway safety concerns, lacks sustainable transport options and is likely to result in car dependency. Given the relatively small scale of the site, it is unlikely that the applicant can implement enough measures to significantly improve the sustainability, particularly prior to GBC having an updated adopted Local Plan (and associated public transport, walking and cycling strategy for this area of the Borough). The cumulative impact of these deficiencies results in an unsustainable development that fails to meet the transport and accessibility requirements of national and local planning policy.

KCC highways therefore objects to the application as it fails to meet the requirements of national and local planning policy, in accordance with NPPF Paragraph 116 (unacceptable impact on highway safety), paragraphs 110–115 (failure to provide genuine sustainable transport choices), and KCC LTP5 (conflicts with goals to reduce car dependency and promote active travel).

**It is important to note that Local Planning Authority (LPA) permission does not convey any approval to carry out works on or affecting the public highway.**

Any changes to or affecting the public highway in Kent require the formal agreement of the Highway Authority, Kent County Council (KCC), and it should not be assumed that this will be a given because LPA planning permission has been granted.

For this reason, anyone considering works which may affect the public highway, including any highway-owned street furniture or landscape assets such as grass, shrubs and trees, is advised to engage with KCC Highways and Transportation at an early stage in the design process.

Across the county there are pieces of land next to private homes and gardens and near the highway that do not look like roads or pavements but are actually part of the public highway.

Some of this highway land is owned by Kent County Council whilst some is owned by third party owners. Irrespective of the ownership, this land may have 'highway rights' over the topsoil.

Works on private land may also affect the public highway. These include works to cellars, to retaining walls which support the highway or land above the highway, and to balconies, signs or other structures which project over the highway. Such works also require the approval of the Highway Authority.

Kent County Council has now introduced a pre-application advice service in addition to a full formal technical approval process for new or altered highway assets, with the aim of improving future maintainability. Further details are available on our website below:

<https://www.kent.gov.uk/roads-and-travel/highway-permits-and-licences/highways-permissions-and-technical-guidance>.

This process applies to all development works affecting the public highway other than applications for vehicle crossings, which are covered by a separate approval process. Further details on this are available on our website below:

<https://www.kent.gov.uk/roads-and-travel/highway-permits-and-licences/apply-for-a-dropped-kerb/dropped-kerb-contractor-information>

Once planning approval for any development has been granted by the LPA, it is the responsibility of the applicant to ensure that before development commences, all necessary highway approvals and consents have been obtained, and that the limits of the highway boundary have been clearly established, since failure to do so may result in enforcement action being taken by the Highway Authority.

The applicant must also ensure that the details shown on the approved plans agree in every aspect with those approved under the relevant legislation and common law. It is therefore important for the applicant to contact KCC Highways and Transportation to progress this aspect of the works prior to commencement on site.

Further guidance for applicants, including information about how to clarify the highway boundary and links to application forms for vehicular crossings and other highway matters, may be found on Kent County Council's website:

<https://www.kent.gov.uk/roads-and-travel/highway-permits-and-licences/highways-permissions-and-technical-guidance>.

Alternatively, KCC Highways and Transportation may be contacted by telephone: 03000 418181.

Yours faithfully

**Director of Highways & Transportation**



\*This is a statutory technical response on behalf of KCC as Highway Authority. If you wish to make representations in relation to highways matters associated with the planning application under consideration, please make these directly to the Planning Authority.