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Highways and Transportation
Kroner House
Eurogate Business Park
Ashford
TN24 8XU
Tel: 03000 418181
Date: 22 April 2026
Our Ref: AC

Application -	GB/20251233
Location -	Land At Rose Farm, Downs Road, Istead Rise, Gravesend Kent
Proposal -	Outline planning application for the demolition of 64 Downs Road and erection of up to 154No. residential dwellings (including affordable housing), with all matters reserved except for access. Creation of a new access from Downs Road.

Thank you for your re-consultation in relation to the above planning application. Kent County Council Highways (KCC) has reviewed the documents and has the following comments to make:

Walking and Cycling

Whilst the response document has not addressed all points set out within KCC's previous response, the applicant now proposes to contribute to the installation of dropped kerbs and tactile paving at the A227 / Istead Rise and A227 / Lewis Road junctions. This is noted and, whilst these measures do not address the wider limitations of the walking and cycling network beyond the village, they would provide some localised benefit in terms of accessibility. The proposals should be secured by condition and installed by the applicant. Given the single stand available, it is recommended that additional cycle parking is installed at the local shopping parade.

Regarding the route north towards Gravesend, the applicant acknowledges that due to the distance, it is unlikely that people would do their weekly shopping on foot and that opportunities for active travel movements outside the village are limited. However, for those that do choose to walk or cycle north, directional signage should be provided on the (northern) A2 roundabout, directing people to cross east–west across the northern arm, to assist with wayfinding and reduce the risk of pedestrians continuing along a footway that terminates before the A227 / Coldharbour Roundabout (however, this would not improve the quality or safety of the route itself).

With regard to access to Meopham Station, the applicant states that, at a distance of approximately 2.5 km, it is unlikely that people would regularly walk this route regardless of its quality. In practice, walking is currently not possible due to the absence of a footway, and cycling is unattractive due to traffic speeds and the lack of dedicated infrastructure. There is therefore concern that, at present, residents are unlikely to be able to leave Istead Rise to access surrounding villages or facilities by walking or cycling in a safe and attractive manner.

The applicant has agreed to provide a proportionate financial contribution to the design and/or construction of a cycle route between (1) Istead Rise and Meopham Station and (2) Meopham

Station to Meopham Secondary School. Whilst this will not eliminate the limitations of cycling accessibility, particularly in the short term, it should help to increase the attractiveness of this mode and reduce reliance on the private car in the longer term.

As requested, the Parameter Plan has been updated to reflect the proposed pedestrian, cycle and emergency vehicle access between the site and Long Walk. This is acceptable.

The Illustrative Masterplan shows a pedestrian route through the site connecting to Downs Road. KCC previously requested that, where possible, this route should also cater for cyclists. No response has been provided on this issue to date, although this can be considered at the Reserved Matters stage.

Public Transport

The nearest railway station is located 2.4km to the south of the site in Meopham, and is currently not accessible on foot. The pedestrian and cycle route to Gravesham in the north is sub-standard and local facilities in Gravesham are located further than what is considered a reasonable walking distance. While cycling along the A227 to the north and south is theoretically possible, the route is unattractive and intimidating, requiring cyclists to travel on a high-speed roads alongside fast-moving traffic and HGVs. As such, it is unlikely to be suitable for anyone other than the most confident cyclists.

The 308 bus service does not currently provide services to Meopham Station to the south, or Gravesham to the north, during the AM peak period, which is a critical time for commuter and school related travel. Consequently, for key destinations, the private car remains the only realistic option. This means the site does not currently offer a genuine choice of transport modes, contrary to paragraph 110 of the National Planning Policy Framework (NPPF).

It is therefore imperative that public transport provision is significantly enhanced in order to mitigate the site's inherent accessibility constraints.

The applicant has agreed to pay a per-dwelling financial contribution to KCC for the enhancement of the 306 / 308 bus service and this is welcomed in principle.

Investment of approximately £3.8 million is required to enhance the 308 service to a level that would represent a credible alternative to the private car and help address the policy conflict identified above. This equates to an indicative contribution of £3,602 per dwelling, based on the 1,055 dwellings proposed along the wider A227 corridor in the draft Local Plan. This contribution could be reduced if other sites obtain planning permission in the short term and a proportionate contribution is secured, ensuring that mitigation remains fairly and reasonably related in scale and kind.

Vehicle Access

The applicant has confirmed that the proposed access gradient is 1:25 (4.0%) for the first 12 metres. This is acceptable, subject to detailed design.

The emergency access proposals are now shown on plan H003 P1 in Appendix B and are acceptable.

As requested, the off-site improvements are now shown on the plans in Appendix B and these will need to be secured by condition. The kerb at the pedestrian access across from 137 Downs Road must be reinstated where not required for the uncontrolled crossing.

Trip Generation and Distribution

The vehicle trip generation table has been updated to reflect the correct figures of 84 two-way vehicular trips in the AM peak and 82 two-way vehicular trips in the PM peak.

Junction Capacity Assessments

The junction models have been updated to reflect the future year of 2042 and the inclusion of the draft Local Plan sites as committed developments. The results are acceptable.

Trees

KCC's previous response requested confirmation as to whether existing trees (not included within the survey) have been evaluated and that they will be protected if construction takes place. This has not been provided. To confirm, if any of the highway trees are proposed to be removed or are damaged during construction, then the full CAVAT fees will be sought.

Summary and Conclusion

In terms of sustainability, the site is not ideally located, and access to services and facilities by walking, cycling and public transport is currently limited. In the absence of mitigation, the site will be highly car reliant.

However, on balance, KCC Highways considers that, subject to the securing of appropriate mitigation, these constraints do not warrant an objection on transport grounds. The site's inclusion within the draft Local Plan, the secured pedestrian and emergency connections, proposed off site highway improvements, and the applicant's agreement to make proportionate financial contributions towards enhanced public transport and strategic cycling improvements collectively weigh in favour of acceptability.

KCC Highways therefore have no further objection to the application, subject to appropriate planning conditions and S106 contributions being secured.

Planning Conditions and Section 106 Obligations

- Dropped kerbs and tactile paving shall be installed by the applicant at the Lewis Road and Istead Rise junctions prior to first occupation of the site.
- The site access points and off-site highway works shown on plans H 01 P5, H 02 P3 and H 03 P1 in Appendix B of the Transport Technical Note (excluding the emergency access) shall be implemented prior to first occupation of the site. Any associated Traffic Regulation Order applications shall be submitted by and funded by the applicant.
- The emergency access shown on plan H 03 P1 in Appendix B of the Transport Technical Note must be implemented prior to the 50th occupation of the site and thereafter be retained and remain available for use in perpetuity.
- Prior to first occupation of the site, visibility splays of 47 metres (west) and 53 metres (east), as shown on plan H-01 P5, shall be provided and thereafter maintained with no obstruction exceeding 1.05 metres in height.
- A financial contribution of £3,602 per dwelling (index linked) shall be paid to Kent County Council prior to first occupation of the site towards the enhancement of the 306 / 308 bus service. The contribution shall be subject to proportionate reduction where other suitable non-Local Plan sites secure planning permission and make appropriate financial contributions towards the same public transport corridor, secured through a Section 106 agreement.
- A per-dwelling financial contribution to be paid to KCC prior to first occupation of the site, towards the design and implementation of a cycle route between (1) Istead Rise and Meopham Station and (2) Meopham Station to Meopham Secondary School, in order to increase the attractiveness of this mode and reduce reliance on the private car. The contribution amount shall be confirmed through the Section 106 agreement.
- A Full Travel Plan, prepared in accordance with the Framework Travel Plan and KCC's previous comments, shall be submitted to and approved by the Local Planning Authority prior to first occupation of the site. The Travel Plan, to be implemented on first occupation, should include such things as traffic generation targets (based on the

traffic generation outlined within the Transport Assessment and Transport Technical Note), detailed annual monitoring methodology (monitoring to occur for a minimum of five years), and mitigation measures should the annual targets not be achieved.

- A KCC Travel Plan monitoring fee of £1,422 shall be paid to KCC prior to the first Travel Plan monitoring period.
- A Construction Management Plan to be submitted to and approved by the Local Planning Authority prior to commencement of development, and shall include, as a minimum:
 - a) Routing of construction and delivery vehicles to / from the site (tracking may be required)
 - b) Details of the parking and turning areas for construction and delivery vehicles and site personnel
 - c) Timing of deliveries (avoiding network and school peak hours where possible)
 - d) Provision of wheel washing facilities
 - e) Provision of measures to prevent the discharge of surface water onto the highway
 - f) Details of any temporary traffic management / signage required.

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.