



National Highways Planning Response (NHPR 25-01) Formal Recommendation to an Application for Planning Permission

From: Hermes Luli (Head of Planning & Development)
Operations Directorate
South East Region
National Highways
PlanningSE@nationalhighways.co.uk

To: Gravesham Borough Council (FAO Ms Rebecca Harrison)
Planning.reps@gravesham.gov.uk

CC: transportplanning@dft.gov.uk
spatialplanning@nationalhighways.co.uk

Council's Reference: 20260649

Location: Land North Of, The Drove Way, Istead Rise, Gravesend Kent

Proposal: Development for up to 100 residential dwellings (Class C3), including the formation of new accesses from The Drove Way, the provision of new areas of public open space and all other associated infrastructure and ancillary works (all detailed matters reserved other than means of access).

National Highways Ref: NH/26/17577

Referring to the consultation on a planning application dated 6 July 2026 referenced above, in the vicinity of the A2 that forms part of the Strategic Road Network, notice is hereby given that National Highways formal recommendation is that we:

- ~~a) offer no objection (see reasons at Annex A);~~
- ~~b) recommend that conditions should be attached to any planning permission that may be granted (see Annex A – National Highways recommended Planning Conditions & reasons);~~
- c) recommend that planning permission not be granted for a specified period (see reasons at Annex A);**
- ~~d) recommend that the application be refused (see reasons at Annex A)~~

Highways Act 1980 Section 175B is not relevant to this application.¹

This represents National Highways' formal recommendation and is copied to the Department for Transport as per the terms of our Licence.

Should the Local Planning Authority propose not to determine the application in accordance with this recommendation they are required to consult the Secretary of State for Transport, as set out in the [Town and Country Planning \(Development Affecting Trunk Roads\) Direction 2018](#), via transportplanning@dft.gov.uk and may not determine the application until the consultation process is complete.

The Local Planning Authority must also copy any consultation under the 2018 Direction to PlanningSE@nationalhighways.co.uk.

This response and all comments outlined herein are made in respect of planning matters only in National Highways' position as a statutory planning consultee, and does not confer any proprietary rights nor amount to the giving or refusal of consent, assent, approval, or awareness of or by National Highways in or of any other aspects or matters (including, but not limited to, the use of property belonging to National Highways). If anyone wishes for National Highways to consider any aspects which do not relate to planning submissions, they should call our contact centre on 0300 123 5000.

Signature:



Date: 26 August 2026

Name: Bidur Rajbhandari

Position: Assistant Spatial Planner

National Highways

Ground Floor, Building 1000, Cathedral Square, Guildford GU2 7YL

www.nationalhighways.co.uk

Annex A **National Highways' assessment of the proposed development**

National Highways has been appointed by the Secretary of State for Transport as a strategic highway company under the provisions of the Infrastructure Act 2015 and is the highway authority, traffic authority and street authority for the Strategic Road Network (SRN). The SRN is a critical national asset and as such we work to ensure

¹ Where relevant, further information will be provided within Annex A.

that it operates and is managed in the public interest, both in respect of current activities and needs as well as in providing effective stewardship of its long-term operation and integrity.

Recommend that planning permission not be granted for a specified period:

It is recommended that the application should not be determined for a period of three months until **26 November 2026**.

This recommendation can be replaced, renewed, or reviewed during the three-month period, or at its end, dependent on progress made with regards to the outstanding matters.

We will be concerned with proposals that have the potential to impact on the safe and efficient operation of the SRN, in this case, particularly within the vicinity of A2.

Reasons

We require further information to be provided by the applicant on this application in order that an informed decision can be made in relation to the potential impacts of the development on the strategic road network. In particular, the following comments should be passed onto the applicant:

Throughout this response **ACTION points** for the applicant are highlighted in **underlined bold**.

Policy

All Transport Assessment and Travel plans for proposals at the site needs to meet the various requirements of DfT Circular 01/2022 and as a part of this will provide a transport vision for the site, identifying how the vision will be realised. There is no reference to the applicable policy is referenced within the TA.

However, we note that the Outline Residential Travel Plan for the development has been prepared under a vision-led, 'Decide and Provide' approach, consistent with KCC and NPPF guidance. This targets a minimum 10% reduction in vehicle trips over the initial five years of occupation of the development.

Trip Distribution

The TA details that it has used 'Location of usual residence and place of work by method of travel to work' data from the 2011 Census for Middle-Layer Super Output Area (MSOA) 'Gravesham 012', which is acceptable.

However, it is not clear that the assessment took the areas within the districts South East region, and the MSOAs of Medway, Tonbridge and Malling, Sevenoaks, Gravesham and Dartford.

In Table 6-1 it shows use of Downs Road (North) which is unlikely given the nature of road for certain destinations like Dartford.

This assessment needs to be revised, and we request the applicant provide an excel sheet output of the Census data along with calculation with routes for examination to ascertain the likely impact on SRN

Non withstanding the above comments Diagram 2 of the TA show that the development will generate 33 and 31 trips during the AM and PM peaks on A2/A227.

Given the sensitivity of this junction to flow change there is a requirement for junction assessment to be undertaken at the A2 / A227 Wrotham Road junction, comprising the north and south dumbbell roundabouts.

Assessment of this SRN junction should be based on a calibrated and validated base year model.

Furthermore, any assessments should include committed schemes within the relevant scenarios and be compliant with the guidance set out in DfT Circular 01/2022. We would therefore recommend that once the full extent of SRN assessment has been agreed, the applicant should seek an up-to-date list of committed developments and details of committed schemes from the LPA.

Calibrated Base model for this junction from previous applications (20251233, Land At Rose Farm, Downs Road, Istead Rise, Gravesend, Kent) can be used for the assessment.

Please note that A2/Wrotham Road junction is currently operating under congested conditions during the evening peak hour with queuing traffic on the A2 westbound off slip. We are aware of two committed mitigation schemes for the southern roundabout at this junction. The longer-term scheme is signalisation, and the short-term scheme is modification of lane markings associated with the off-slip.

These schemes are shown indicatively on the following drawing numbers:

- 'Interim Mitigation Scheme' Drawing Number: 22052-MA-XX-DR-C-0102 P07
- 'Final Mitigation Scheme' Drawing number: 684437CH-JAC-A2-HGN-DR 1200-001 Rev P01 (Jacobs, August 2020)

Consented planning applications which have assessed and are committed to delivering these schemes

- Former Tollgate Hotel, Gravesend (LPA reference 20240856) – 'Interim mitigation scheme'
- Land at Coldharbour Road (LPA reference 20141214) – 'Final mitigation scheme'

Depending on the impact of the development on SRN these committed mitigation will need to be modelled to assess the impact on SRN.

Collision Data

The TA provides Personal Injury Collision (PIC) data has been reviewed for five-year period (2020 - 2024) for the surrounding highway network

Collision data for the relevant area depending on Impact on SRN should be obtained the latest 5 year period available.

Construction Management Plan

At the appropriate stage of the planning process, we suggest that National Highways recommend a suitable planning condition in relation to the preparation, agreement, and adherence to a Construction Traffic Management Plan (CTMP).

Standing advice to the local planning authority

The Climate Change Committee's [2022 Report to Parliament](#) notes that for the UK to achieve net zero carbon status by 2050, action is needed to support a modal shift away from car travel. The NPPF supports this position, with paragraphs 77 and 110 prescribing that significant development should offer a genuine choice of transport modes, while paragraphs 109 to 116 etc advise that appropriate opportunities to promote walking, cycling and public transport should be taken up as part of a vision-led approach.

Moreover, the carbon reduction hierarchy (avoid-switch-improve) as set out in clause 4.3 of PAS2080:2023 promotes approaches and measures to minimise resource consumption and thereby reduce carbon emissions.

These considerations should be weighed alongside any relevant Local Plan policies to ensure that planning decisions are in line with the necessary transition to net zero carbon.