



Active
Travel
England

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Your Ref: 20260207
Our Ref: ATE/26/00422/OUT
Date: 17/09/2026

Active Travel England Planning Response Detailed Response to an Application for Planning Permission

From: Spatial Planning Service, Active Travel England

To: *Gravesham Planning Team - Gravesham Borough Council*

Application Ref: 20260207

Site Address: **LAND NORTH OF, CAMER ROAD, MEOPHAM, GRAVESEND, DA13 0YE**

Description of development: *Outline planning application for up to 725 dwellings (Use Class C3), a new two-form entry primary school (Use Class F1), a Local Centre (up to 500sqm of Class E floorspace), the provision of Public Open Space including sport and recreation facilities alongside associated access, landscaping, parking, and infrastructure; with all matters reserved except for access.*

Notice is hereby given that Active Travel England's formal recommendation is as follows:

Deferral: ATE is not currently in a position to support this application and requests further assessment, evidence, revisions and/or dialogue as set out in this response.

ATE notes that no specific response has been provided to our previous comments. The contents of this response have come from the response to the LHA, which contains some relevant and constructive information, however without addressing many aspects of our original response, ATE is unable to change its recommendation.

ATE welcomes the response to the LHA providing progress on the following issues:

- Providing a link to Sole Street station (subject to suitable lighting being provided and subject to agreement with Network Rail and see below comments.)
- Contribution to LCWIP and/or wider strategic active travel infrastructure (to be agreed with LHA.)
- Confirmation of the intention to provide buses and to safeguard school transport (to be agreed with LHA.)
- Reduction of roundabout size
- Upgrading of bus stop outside Sole Street station

-Provision of a car club.

-Confirmation that paths will be "attractive, well-overlooked and designed in accordance with the principles of Manual for Streets, incorporating appropriate passive surveillance and lighting where required."

The following issues remain unresolved

ATE previously requested updates to the trip generation to provide an hourly breakdown across the day to provide a better indication of the types of journeys taking place, and at what times. This has not been provided.

ATE welcomes the commitment to not reduce the 10% reduction in car trips target. However, the applicant has not addressed ATE's previous comments on the matter (which differ from the LHA comments.)

ATE reiterates its stance that a 5% walk and 2% cycle mode share target is disappointing, and indicates the development is likely to be car dependant. It also conflicts with the suggestion that people are likely to walk into Meopham to access services, and indicates that they will likely drive, which is a concern. ATE welcomes the progress made in improvements to active travel and public transport but remains concerned whether these will drive meaningful modal shift. ATE recommends higher walk and cycle mode share targets are used, but also suggests these potential shortcomings are considered as part of the planning of the local centre to provide sufficient space for ample local amenities as far as is reasonable during the planning process.

It remains unclear whether Southeastern railway is able or willing to increase the train service to Sole Street. ATE understands discussions on the matter are underway. Providing a connection to Meopham via the Sidings has also not been addressed. ATE considers the site not to meet the definition of being "physically well related to a well-connected station." unless either:

- a) A direct connection can be made to Meopham station via the Railway Sidings is provided or
- b) Sole Street station gets a service uplift to at least four trains per hour.

ATE does not necessarily require these to permit the development, however this should be taken into consideration as part of the planning balance when considering the site sustainability, and notes the site appears to not meet the requirements under NPPF S5h relating to stations without one or both of the above being changed.

ATE remains concerned with the lack of step free access to the eastbound platform at either station, although recognises this is beyond the scope of this development. It is recommended this be discussed with relevant stakeholders.

Whilst ATE welcomes the above comments on overlooking, it is not known whether KCC Highway's concern regarding the overlooking of Norwood Lane has been addressed. ATE considers this a separate and more pressing matter because of the impact it is likely to have on the active travel route, and requests confirmation that Norwood Lane will be overlooked. In line with the above commitment, ATE expects to see a suitable lighting plan at RM stage which covers all significant walking and cycling routes and recommends a planning condition to achieve this, and notes policy TR4c:

"Ensure that the arrangement of streets and other routes help to create places that are safe, inclusive and attractive for all users (particularly for women and girls, for other groups who may be vulnerable to crime or the fear of crime, and for those with limited mobility). This includes reflecting relevant aspects of policy DP3(2), as well as employing measures to: i. Minimise the scope for conflict between pedestrians, cyclists and vehicles; ii. Meet the needs of disabled people, older people and children in relation to all modes of transport, and iii. Avoid unnecessary street clutter."

ATE welcomes the proposal of a connection to Sole Street station and expects the applicant to work with Network Rail to ensure this can be delivered, considering this to be a key aspect of the proposal. However, ATE has some concerns with the design. ATE welcomes the ramp having a 1:20 gradient but is concerned the 2.0m width and narrow landings is quite narrow and may prevent cycles from using the ramp. It is understood the proposals Additionally, providing steps would reduce the distance needed to travel and reduce conflicts between users, and steps with a cycle groove would provide an alternative if the ramp was not able to be widened. The connection to the station should be suitably classified/specified to enable cycles to use it, and the surfacing should be sealed on all major walking and cycling routes. Unbound or mown paths are only considered acceptable for leisure routes or when an equally or more direct sealed path is provided.

ATE welcomes the indicated contributions to active travel infrastructure and buses, and requests these to be secured by condition. ATE recommends this be worded to provide maximum flexibility to the LHA to deliver suitable active travel infrastructure.

ATE requires additional information before the bus proposal can be supported, including costings, service frequency, first and last buses and support duration before these proposals can be supported. However, ATE recommends the applicant instead provides contributions towards KCC's proposals of significantly improving service frequency on the 308, as this would allow resources to be used more effectively.

The previously mentioned issues with the active travel audit noting that proposed improvements are to be responsibility of the LHA have not been addressed and ATE maintains this is unacceptable.

ATE has been advised by the LHA that any closure of Norwood Lane for roadworks would require the road to close entirely. This represents a concern as this forms part of the main walking and cycling corridor, and KCC has indicated they are not happy with this arrangement. In the event Norwood Lane is not closed to motor vehicles, a parallel walking and cycling route should be provided. The applicant has not addressed ATE/KCC's concerns regarding lighting and overlooking of Norwood Lane.

ATE advises the LPA to provide a condition to ensure the frontage path proposed by the adjacent Norwood Lane development is completed prior to occupation. This would ensure this link is still delivered in the event that development does not go ahead. This could be done by a Grampian condition.

ATE notes the pedestrian crossing at Green Lane is far off the pedestrian desire line and risks pedestrians attempting to cross directly. This would be solved by moving the pedestrian crossing towards the junction.

ATE considers a pedestrian crossing on the northern arm of the junction would be a useful addition, though notes there are other nearby options.

ATE welcomes the progress made as part of this development towards addressing our concerns, however, there remain outstanding issues which need to be addressed before ATE is willing to change its recommendation. ATE would be happy to review any additional information and remains in discussions with KCC Highways on this application.