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Highways and Transportation
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Tel: 03000 418181
Date: 23 September 2026
Our Ref: SS4AC

Application -	GB/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).

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

The National Planning Policy Framework (NPPF) has been updated since the submission of this planning application. Accordingly, this application will be considered against the August 2026 NPPF and the applicant may wish to update their documents to reflect and respond to this.

The Site

The existing site is an undeveloped plot of land to the north of The Drove Way, located within Istead Rise. The site area extends to approximately 5.7 hectares and encompasses some established woodland alongside open space.

Proposal and Vision

The proposal is for up to 100 residential dwellings and the formation of two new accesses from The Drove Way, with all other matters reserved. The vision to promote a sustainable site, enabling non-car accessibility and social inclusion, is welcomed, as is the vision-led assessment set out within the Transport Assessment (TA). However, KCC questions some of the statements supporting this vision and these concerns are set out in more detail below.

Accessibility by Sustainable Modes

Walking and Cycling

Section 3 of the TA outlines the accessibility of the site by non-car modes, with the walking and cycling isochrones (Figures 3-1 and 3-2) demonstrating that local amenities within Istead Rise, and onward journeys to urban centres such as Meopham and Gravesend, are theoretically accessible via active travel.

However, a detailed walking and cycling audit has not been undertaken or presented within the TA. Section 3.2.4 states that “the pedestrian environment within Istead Rise is generally of good quality” without specific regard or reference to any of the below:

- Severed links or missing footways/cycleways,

- Landscaping strips, or other physical structures, that separate the footway from the carriageway,
- Missing dropped kerbs and tactile paving,
- Lack of pedestrian crossing points,
- Narrow and/or obstructed footways, including those narrowed/obstructed by footway parking,
- Barriers to cycles, prams, wheelchairs, mobility scooters, or any other mobility aid,
- Areas which experience consistent flooding or ponding,
- Damaged or inappropriate surfacing,
- Lack of street lighting,
- Overhanging or encroaching vegetation which requires maintenance,
- Identification of any routes which are not safe, or are unlikely to feel safe,
- Routes with stepped access only,
- Gradients that may reduce the attractiveness and accessibility of walking and/or cycling,
- Any perceived vehicle speeding issues which may impact the walking and cycling environment.

Figure 3-3 within the TA shows a range of amenities that are accessible within a 20 minute walk of the site, including bus stops by the Nash Bank/Wrotham Road junction. However, the footway is severed between the site and these bus stops, meaning they are not safely accessible for pedestrians. It could also be misleading to include these bus stops on the plan as it is highly unlikely site residents would use them owing to the presence of other bus stops much closer to the site.

Paragraph 3.3.1 of the TA states that Meopham Station is accessible via cycle in approximately 11 minutes via the A227, but fails to mention the 50mph speed limit present for a large portion of this route and lack of street lighting. In accordance with Figure 4.1 of Local Transport Note 1/20, cycling in mixed traffic on roads with a 30mph, or greater, speed limit carrying significant traffic volumes will generally exclude many potential users and/or give rise to safety concerns. KCC therefore considers that the route is likely to be attractive only to the most confident cyclists and does not represent a realistic alternative to private car travel for many potential users of the development. Additionally, the footway on this route is severed before it reaches Meopham, meaning no connection to the train station, or any other facility, can safely be made by pedestrians. Likewise, though there is a shared pedestrian/cycle route north towards Gravesend (alongside the A227) it is not of particularly high quality, lacks street lighting, is in need of resurfacing. Overall, these factors mean that walking and cycling outside of Istead Rise itself are unlikely to be realistic or attractive choices for most residents, particularly children, older people, and those with mobility impairments or other disabilities.

Some local facilities are available at the shopping parade, approximately 450 metres from the site boundary, including a convenience store, pharmacy, butchers, dentist and a community centre. The nearest supermarket is located 2.8km away via the shared A227 route to Gravesend noted above, which at over 40 minutes' walk, is likely to be too far for most people, especially those purchasing a weekly shop. A primary school is located approximately 900 metres from the site and a secondary school is located approximately 5.5km to the south in Meopham. However, the capacity of these schools is queried, and should they lack suitable capacity to accommodate the development's demand for primary and secondary school places it is likely that residents would need to travel out of the area to access educational facilities, alongside larger, higher order retail. Given the lack of footways, cycling facilities and bus provision, and the distance to the train station, it is likely that most, or all of these trips would need to be made by private car, offering no genuine choice of sustainable travel modes.

The Illustrative Masterplan and Parameter Plan both show indicative connections to Public Right of Way (PROW) NU27 along the eastern edge of the site. This is welcomed to support access to the countryside and leisure activity, and supports NPPF Policy TR8.

KCC and Gravesham Borough Council (GBC) have recently commissioned work on the design of a high-level cycle scheme between (1) Istead Rise and Meopham Station and (2) Meopham Station to Meopham Secondary School. This scheme is broadly in line with the proposed route within, and supports the aspirations of, the Local Walking and Cycling Infrastructure Plan (LCWIP). In order to support cycling between the site and facilities in Meopham, and in line with other applications on or around the A227 in this area, a per-dwelling financial contribution will be required towards the detailed design and construction of the new cycle scheme.

Public Transport

KCC's concern is not simply that public transport exists, but whether it provides a realistic, attractive and convenient alternative to the private car for a broad range of day-to-day journeys.

Bus stops are located 450 metres and 700 metres from the site, on Flowerhill Way and Istead Rise respectively. However, there are no bus shelters, except for the eastbound stop on Istead Rise, and they are only served by two non-school services - the 308 and 306 between Bluewater and Sevenoaks. These routes have significantly limited service Monday-Saturday with just two commuter services from Istead Rise during the AM peak period (07:00 – 09:00), only one commuter service per direction in the PM peak hour (17:00 – 18:00) and no services at all on a Sunday. Service 308 currently requires subsidy, indicating commercial unsustainability. A number of school services operate along the A227, however the KCC public transport team have confirmed these are either at or near capacity. The existing level of bus provision is therefore inadequate to be a reliable and realistic choice to meet the needs of future residents and must be improved.

The nearest railway station is located approximately 3.1km to the south of the site in Meopham. As set out under 'walking and cycling', this is not accessible by either pedestrians or all but the most confident cyclists. There are only two bus services to the station during the AM peak period and one return journey during the PM peak hour, leaving the only realistic option of travel by car.

Meopham station does not have step free access to all platforms, meaning it may not be suitable for use by those with mobility impairments. For these individuals the nearest accessible station is Gravesend, which is 5.3km from the site. This is considered to be too far to walk to and is not considered to be safely accessible by all but the most confident cyclists owing to the quality of the route (as detailed above). Due to the significantly limited bus service, the only realistic option of travel is also via private car.

As detailed above, the private car remains the only realistic option for key destinations, meaning the site does not currently offer a genuine choice of transport modes, contrary to NPPF Policy TR4. In order to enhance the public transport offer between the site and key destinations, a per-dwelling financial contribution will be required for the enhancement of the 306/308 bus service (or other such service along this A227 corridor). This contribution would be circa £2,417 per dwelling, secured via a Section 106 agreement, and is consistent with contributions requested from other development proposals along the A227 corridor in Gravesham.

Safety:

A crash data assessment has been provided for the five-year period 2020-2024. However, this is not the most recent five-year period, with all of 2025 and a substantial proportion of 2026 omitted. Additionally, the data source utilised has not been defined and therefore cannot

be checked for accuracy. For clarity and robustness the data should be updated, with the source information clearly detailed. It is noted that National Highways have also requested the collision data assessment be updated to show the most recent five-year period.

Notwithstanding the above, and having reviewed the collisions and their contributing factors for the most recent five-year period in the immediate vicinity of the site (data available internally to KCC), there is not considered to be an existing safety issue.

A Stage 1 Road Safety Audit (RSA1) and associated designer's response is required to be undertaken and supplied in relation to this application. This RSA1 must cover both proposed access points and any off-site highway network changes.

Access Proposals

The proposed development includes two access points, connecting to The Drove Way via existing "spurs". These spurs do not have standard formal junction markings with The Drove Way and currently serve just four and two vehicle crossovers respectively. The western access is proposed to be for general vehicles, pedestrians and cyclists, whilst the eastern access is proposed to be for emergency vehicle access (restricted via retractable bollards), pedestrians and cyclists.

Creation of the western site access will result in significant intensification of use of the existing highway spur connecting the site to The Drove Way. Consequently, it is necessary that the spur/The Drove Way junction be formalised into a standard priority junction with appropriate road markings, visibility splays, and pedestrian crossing points provided. Vehicle visibility splays are required to be provided on a scaled plan with set-back and sight stopping distances in accordance with the Department for Transport's Manual for Streets Guidance, measured to the nearside kerb in both directions, with no obstructions greater than 0.6 metres above carriageway level within the splays. Amendments to road markings and pedestrian crossing points are detailed under the "Off-Site Highway Improvements" section below.

The eastern access is proposed to be for emergency vehicle use only, alongside active travel. Use by emergency vehicles is anticipated to be very infrequent and consequently it is considered that the vehicle/pedestrian segregation, and overall width is unnecessary with increased hardstanding and potentially negative associated environmental impacts. Emergency access routes need to be a minimum of 3 metres width, with 4 metres being ideal. This is commonly provided via a shared route for pedestrians and cyclists, controlled via bollards as is suggested for this development, with no segregated carriageway. The lack of segregated carriageway emphasises the active travel nature of the route, without preventing emergency access, and minimises the overall space and hardstanding required. The applicant is encouraged to consider amending the proposed eastern access accordingly.

The eastern access carriageway, prior to the bollards, is wide, and due to the bollards preventing through movements may be viewed as a turning head or opportunity for on-street parking, which is noted to occur within the current spur layout, by individuals on The Drove Way. Any such parking would obstruct the emergency access raising safety concerns which the applicant is requested to address. The applicant may wish to consider the below in association with mitigating this safety issue:

- Given the limited existing access requirements of this eastern spur the carriageway could be narrowed, with the bollards moved further south, potentially reducing the attractiveness of parking in this location.
- Provision of double yellow line road markings to restrict on-street parking. This would require a change to the Traffic Regulation Order (TRO) which cannot be guaranteed under planning due to the consultation within the TRO amendment process.

- Provision of signage stating the access is for emergency use only and is not to be obstructed.

Off-site Highway Improvements

The development proposals do not include any off-site highway improvements, though the following are requested to be included as part of the proposals.

The junction of the western “spur” with The Drove Way must be amended to a formal priority junction as detailed above and in accordance with the Traffic Signs Manual (TSM). This will require provision of vehicle visibility splays, in accordance with the DfT’s Manual for Streets Guidance, and amendments to the road markings, including but not limited to:

- provision of a central white line at the junction,
- removal of the double white dashed lines on the western half of the junction, replaced by a single white dashed line,
- provision of a triangle road marking to indicate priority for the east-west The Drove Way.

There is currently no pedestrian crossing across The Drove Way in the vicinity of the site access. As the proposals will be formalising the western spur/The Drove Way junction, and significantly intensifying use of this road, it is necessary to provide an uncontrolled pedestrian crossing with dropped kerbs and tactile paving to support and encourage active travel, including routes to bus stops. The crossing point must also be captured within the requested Road Safety Audit (detailed above), and visibility splays provided.

Alongside the contributions detailed under the “Accessibility by Sustainable Modes” section above, the applicant is requested to install a bus shelter for the westbound stop on Istead Rise. The addition of a bus shelter with a weatherproof waiting area, including seating, would provide shelter for all users during inclement weather, potential shade during hot weather, and a rest point for bus users, and potentially for passing pedestrians, who may have reduced physical fitness or mobility.

Parking

Vehicle parking is proposed to be provided in line with KCC’s 2025 parking standards for a “suburban” location. Please can the applicant detail why this location type has been suggested for use rather than “rural”? Though this can be managed at reserved matters stage. The provision of one active electric vehicle charging point per unit is welcomed.

The provision of cycle parking at a ratio of one space per bedroom for all dwelling types is in line with KCC’s standards and is acceptable.

Trip Generation and Distribution

The use of Edge of Town locations for the TRICs assessment is questioned, though may be mitigated by the restriction of population within 1 mile to below 10,000.

Reduction of vehicle driver trips by 10%, to reflect the Outline Residential Travel Plan (ORTP), is in line with the approach for a vision led assessment. However, without mitigation measures, which the proposals do not currently include, this is considered unrealistic and may result in the vehicle trips for the site being under-represented, albeit by a small amount (circa 5 in each peak period).

The mode share (Table 5-4) shows a high proportion of trips via rail, though the majority of trips from the site to the train station are likely to be via private vehicle, as detailed above, owing to the limited existing active travel and public transport links. Therefore, in reality most of these rail trips are likely to be vehicle trips.

The proportion of trips (22%) routing via Upper Avenue onto Downs Road (north) is questioned. This is unlikely to be an attractive route for many given its nature, which it is noted has also been raised by National Highways.

Highway Impact, Committed Developments and Junction Capacity Assessment

The traffic modelling should take account of the following as committed developments, noting they are awaiting planning or appeal decisions. Inclusion of these developments, alongside those listed within the TA, will constitute a robust assessment, with local traffic overestimated in the event that one or more should not come forward.

- Land at Blackthorn Farm, Wrotham Road, for up to 100 dwellings. Application reference 20250802, appeal reference 6007106.
- Land adjacent to Longfield Road, Meopham, for up to 120 dwellings. Application reference 20250993.
- Land north of Camer Road, Meopham, for up to 725 dwellings, a two-form primary school and local centre. Application reference 20260207.

Notwithstanding the above, it is anticipated that inclusion of these additional committed developments is likely to reduce the relative impact of the development proposals. Therefore, whilst it is recommended that the traffic modelling is updated, it is not cause for objection as the current approach is likely to represent a larger impact and is therefore “worst case”.

Modelling has not been undertaken for the A2/A227 junction, and no justification for this omission has been provided. KCC are aware that queuing frequently occurs on the southern arm of this junction, raising concern as to the impact of the proposed development. It is noted that National Highways have also requested this be modelled.

The future year for the traffic modelling is 2031, which is five years post submission. However, the future year should be the end of the local plan period or 5 years post full occupation, whichever is the later. The future year modelling should be updated accordingly, with any information/ estimated timelines detailed to ensure clarity regarding how the future year has been determined. Nevertheless, the relative impact of the proposed development is likely to be reduced with an extended future year, owing to increased background growth and possible additional committed development traffic, meaning the outputs shown in the TA are likely to represent a “worst case”.

The TA has the AM and PM peak hours respectively as 08:00 – 09:00 and 17:00 – 18:00. Given this, the start and finish time of the modelling should be 07:45 and 09:15 for the AM peak and 16:45 and 18:15 for the PM peak, rather than 08:00 – 09:30 and 17:00-18:30 as shown. The modelling therefore does not include the shoulder peaks correctly which could impact queuing and peak hour demand.

In the event that the traffic modelling is updated in line with the comments above, and shows a notable impact upon any part of the local highway network, it is considered unlikely that any meaningful mitigation can reasonably be provided by the proposed development. In line with a vision led approach, it would be preferable to remove vehicle trips from the network through improvements to sustainable modes and consequently it is KCC's preference for the proposed development to contribute to the active travel, public transport and off-site highway improvements as detailed earlier in this response.

Outline Residential Travel Plan

KCC's Transport Assessment and Travel Plan Guidance was updated in 2025, superseding the previous guidance detailed in Section 2.1.2 of the ORTP and it is recommended the applicant reviews this and updates the document as appropriate.

The comments made above in the "Accessibility by Sustainable Modes" section of this response are also pertinent and apply to Section 3 of the ORTP.

The Travel Plan must be implemented from first occupation until five years post full occupation, rather than for "an initial 5-year time period" as per Section 5.2.1. Clarity is required regarding when the baseline survey will occur. Section 8.1.2 states the baseline survey will take place within three months of the first occupation, whilst Section 8.3.1 states it will occur within three months of 75% full occupation.

Additionally, monitoring travel surveys and associated reports, must be undertaken annually as is standard practice and per KCC's Travel Plan guidance. Annual surveys enable trends to be identified and mitigation measures implemented as may be required before long-term habits establish. The monitoring surveys should be undertaken at the same time of year as the baseline survey to prevent seasonal bias impacting the results. The baseline and monitoring surveys should be comprised of vehicular counts and may be supported by other forms of data such as household questionnaires.

It is very unusual for targets to be split by peak period and it is recommended that the target be amended to a 10% reduction in total car/private vehicle trips (across any given day). Other targets which support the reduction in vehicle trips could be considered.

The applicant is requested to consider the below in relation to the Travel Plan measures:

- Inclusion of information on cycle parking at key destinations, such as at schools, train and bus stations/stops, local retail etc. within the Travel Welcome Pack.
- Provision of parcel lockers within the site to reduce the need for local trips.
- Provision of one free one-year bus ticket per household for local services. This is likely to encourage individuals to try bus services, positively influencing travel habits from the outset.

A single fee of circa £1,422 will be required to cover KCC's involvement with the monitoring of this Travel Plan. This can be secured via a Section 106 agreement.

Policy

Section 2.9.1 of the TA states "The Proposed Development is consistent with the key requirements of national, county and local transport planning policy". However, this is questioned.

Contrary to Section 2.8.3 of the TA, the emerging Local Plan is not considered to be a material consideration as it has not yet been submitted to the Planning Inspectorate for consideration.

NPPF Policy TR3 places significant emphasis on locating development in sustainable locations which limit the need to travel, particularly by private car, provide a genuine choice of transport modes, take account of the needs of different users, and promote sustainable patterns of movement. Policy TR3(1)(e) in particular states *"In rural areas, opportunities to improve walking, wheeling, cycling and public transport and enhance the connectivity of an area should be taken where they exist and can be supported by the development proposed."*

Whilst KCC accepts that opportunities for sustainable travel in rural areas will differ from those available in urban locations, the NPPF nevertheless expects development in rural areas to take opportunities to improve active travel, public transport and connectivity where these can

be supported by the development proposals. The existence of some opportunities to walk/wheel, cycle or travel by public transport does not, in itself, amount to genuine transport choice and consequently, KCC's concern is that future residents would remain heavily reliant upon the private car for a substantial proportion of day-to-day journeys, including to employment opportunities, rail services, secondary education and expanded retail provision. It is therefore considered that current proposals do not promote sustainable patterns of movement as required by Policy TR3.

The relationship between Policy TR3 and Policy CC2(1)(b), which seeks to support development patterns that reduce transport-related emissions and reliance on private car travel, is also noted. There is concern that the development proposals would generate a predominantly car-based pattern of movement which would conflict with the objectives of both policies.

NPPF Policy TR4 places emphasis on creating places that support safe, convenient and attractive travel by sustainable modes, meet the needs of different users and provide effective connections both within the local area and with neighbouring areas. Particular weight is attached to the requirement to provide effective connections with neighbouring areas as many of the destinations likely to generate regular trips by future residents, including rail services, employment opportunities and secondary education, are located beyond Istead Rise itself. NPPF Policy DP3(2)(d) is also considered relevant to the assessment of the development proposals as it states *"[development proposals should] provide transport infrastructure and choice which support the design vision for the site, provide good connections to the wider settlement (or those nearby), and prioritise walking, wheeling, cycling and public transport."*

The development proposals are supported by an Outline Residential Travel Plan, which is in accordance with NPPF Policy TR6(1)(b). However, travel plan measures are generally most effective where realistic alternatives to private car travel already exist or are proposed as part of the development. KCC's concern remains that the locational characteristics of the Site limit the effectiveness of behavioural measures in achieving meaningful modal shift. The Travel Plan may encourage residents to consider alternative travel choices, but it cannot overcome the limitations associated with the Site's accessibility and connectivity.

The development proposals do not currently include any mitigation measures to improve pedestrian, cycle or public transport infrastructure/services. Contributions to both an enhanced bus services and the design and implementation of a cycle route to Meopham, alongside off-site highway improvements, as requested above, would notably improve the sustainability of the site, reduce reliance upon car-based trips, improve connectivity to neighbouring areas, and improve the realistic effectiveness of travel plan measures, in line with the NPPF.

Summary and Conclusion

In summary, though the development is anticipated to have a moderate impact upon the local highway network, there are not considered to be any meaningful mitigation measures that the development could reasonably provide to improve junction or link capacity. In line with the NPPF, and to support a vision led development, the preference would be to remove vehicle trips from the network through modal shift to active travel and public transport modes.

Consequently, provision of the requested contributions to the cycle route, 306/308 bus service and off-site highway improvements will be of most benefit to the locality and future residents and are requested to be secured as part of any planning consent that may be granted by the Local Planning Authority. If these contributions/improvements cannot be secured KCC would have significant concerns with the sustainability of the site.

KCC would like to place a holding objection on the application until the requested information relating to the proposed access proposals and road safety audit have been provided and reviewed.

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.