



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

From: Planning & Development Division, Active Travel England

To: Gravesham Borough Council

Application Ref: 20250992

Site Address: Land At Wrotham Road Meopham Gravesend, Kent, DA13 0AA

Description of development: Outline application for the erection of up to 350 residential dwellings, public open space and associated works. Approval is sought for the principal means of vehicular access from Wrotham Road and all other matters are reserved.

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.

Background and summary

ATE welcomes the opportunity to comment on this application, an outline application for 350 homes near Wrotham Road, Meopham, Kent.

Trip generation assignment and mode shares

The Transport Assessment has not forecasted the level of trips by all modes likely to be associated with the development, as required by National Planning Policy guidance on Travel Plans, Transport Assessments and Statements. This does not represent a sound basis upon which to forecast the needs for active and sustainable travel, nor does it demonstrate a commitment to improving and enhancing active travel networks that serve the site. ATE therefore expects the applicant to present a multi-modal trip generation analysis of all modes of transport throughout the day, rather than the analysis being confined to peak hour periods.

ATE supports the use of the TRICS methodology. 2011 Census data is considered both outdated and unsuitable due to its focus on commuting journeys and exclusion of other types of trips.

ATE considers the provided route audit to be detailed, although invites the applicant to further consider the shortfalls and what can be done to address these alongside

consultation with KCC Highways.) The audit would benefit from including the area around the station. ATE would question some of the scoring given to cycling routes in particular, which operate with the assumption that the carriageway is safe and acceptable for cycling. Given the high traffic numbers, ATE does not support this and would welcome the LHA opinion on this aspect.

ATE would expect to see a more ambitious AT uplift target as part of the travel plan, considering the surrounding amenities, schools, shops and train station, and to consider what opportunities are present to maximise travel by these modes. Additionally, the travel plan should include action to be taken if the targets are not met. The proposed sustainable transport initiatives are supported.

Off site infrastructure

Walking

Due to the traffic volumes of the A227 exceeding 10,000 vehicles per day (DfT, 2024), an 85th percentile speed over 30mph, and its "strategic function" connecting the A2 and M20/M26, ATE would suggest that a signalised crossing be considered. This is understood to be supported by KCC highways. This would be most appropriate between the site and Camer Parade to serve people using the shops. ATE supports the approach from KCC Highways of providing a smaller 6m radius junction as opposed to a larger 6.5m radius junction, as the reduced crossing distance and therefore vehicle speeds are less hostile to active travel. Local amenities are good, with a primary school, shop and local businesses being located under 200m from the site entrance. Some other amenities are located further than the 800m recommended maximum walking distance outlined in the National Design Guide (2021) including a doctor's surgery (1.1km), secondary school (1.2km) and Meopham train station (1.2km). The latter is particularly important to enable multimodal journeys. The nearest large supermarket is over 5km away, which is disappointing.

ATE would like to reiterate that if the distance to key amenities is greater than 800m it is even more important that the route is of high quality. In any case the route should be accessible to all users with:

- a minimum width of 2m with no clutter
- continuous pavement or dropped kerbs at side roads
- be made of a smooth, continuous and sealed surface throughout with no steps
- good lighting, wayfinding, sightlines
- crossing points where appropriate (consider controlled crossings due to traffic volumes)

ATE would like to remind the applicant that the above standards include PRoWs. This should be agreed with KCC's PRoW department.

Cycling

ATE does not consider the proposed 3.0m shared use paths LTN 1/20 compliant and notes the applicant appears to have the space to separate pedestrians and cyclists which should be considered. This is particularly important given the use of the route by families and children to access the nearby schools. ATE notes the intention to use Tradescant Drive and Norwood Lane as an alternative cycle route to Meopham station from the north of the site. ATE does not consider this to be acceptable due to the following:

- The route is not direct or intuitive for cyclists to follow
- Norwood Lane represents a major concern due to its narrow width, poor visibility and lack of lighting.
- The narrow alleyway presents a safety concern, both physically due to the narrow width for bikes to pass and for perceived safety. LTN 1/20 does not permit the use of access controls which require cyclists to dismount, as they are not inclusive and restrict the use of the route for disabled cyclists who cannot dismount, as well as cargo bikes and other non-

standard cycles. The path would additionally require reclassifying. This approach does not appear to be supported by the LHA and is not supported by ATE.

ATE would encourage the applicant to consider all possible options for cycle infrastructure on Wrotham Road in order to deliver cycle infrastructure that is safe, coherent, attractive, direct and comfortable as per LTN 1/20, and reiterates that cyclists should not be expected or encouraged to cycle in mixed traffic on Wrotham Road (A227.) This approach is supported by KCC Highways. The side road adjacent to St Pauls Church could also be used. Provision for cycles south of the site should be investigated at least as far as Meopham school, in order to provide cyclists with a choice of route and avoid forcing cyclists to use the carriageway.

Public Transport

ATE supports the approach taken by the applicant to focus efforts on improving bus service on Wrotham Road and supports the improvement of bus stops to add shelters and real time information. ATE requests this additionally be supplemented with seating (unless this is included as part of the shelter) in order to comply with LTN 1/24 Bus User Priority (6.10, p49-50) ATE requests to be notified of the results of engagement with KCC Public Transport and the bus operators, and seeks commitments which should be secured by an appropriate condition at this stage. ATE maintains the belief that improved bus service, particularly to Gravesend, would be a welcome intervention to reduce car usage and traffic. Discussions with Southeastern around the potential provision of step free access at Meopham station (which currently has none for trains away from London) would be welcomed. Additionally, discussions regarding service frequency or alterations would additionally be worthwhile, particularly regarding peak time services to improve the attractiveness of walking or cycling to Meopham station vs driving to Ebbsfleet. Current peak time journeys from Meopham to London Victoria are around 50 minutes, meaning some commuters may decide to drive to Ebbsfleet should the issues identified not be addressed.

Other comments

ATE strongly suggests that the applicant engage with the developers of other nearby proposals, such as Taylor Wimpey's development to the west of Norwood Lane, in order to create an integrated transport strategy and deliver more effective offsite improvements. This represents an opportunity to combine resources to create high-quality active travel infrastructure. The junction with Green Lane would benefit from being redesigned in order to make it easier to cross on foot and keep vehicle speeds low. It is understood this approach is supported by KCC Highways. It is also worth considering whether the junction with Longfield Road could be altered to reduce vehicle speeds. ATE supports the proposal for a pedestrian/cycle priority at the site entrance, but requests clarity regarding the design of this. The drawings do not make it clear which sections of the path (if any) are raised. Whilst ATE does not object to this design, it does encourage the applicant to work with the LHA to provide a design which is safe and suitable for all users. The design incorporates aspects of a continuous footway/priority treatment, but it may not be easily interpreted by all road users. Setting this back from the road slightly to allow one car length whilst maintaining AT priority could be beneficial in order to reduce conflicts, and to make the crossing easier to use for drivers. Examples can be seen on LTN 1/20 p106.

Masterplanning and permeability

Whilst this application is at outline stage, ATE considers this the best time to comment on the proposed site layout ahead of progression to reserved matters. ATE views the site access points as acceptable and requests all proposed AT access be safeguarded at this stage. ATE is broadly satisfied with the active travel access layout, however, believes an

additional connection across the middle of the site (east-west) would dramatically improve site permeability and allow the active travel potential to be fully realised. This could be achieved through a new path, or a modal filter on one of the residential streets. ATE does not consider a 3m wide shared use path as LTN 1/20 compliant and asks the applicant whether it is possible to separate pedestrians and cyclists. This is most pressing for the A227 and primary access roads. ATE generally does not support mown paths, however, will not object specifically to the path proposed at the very north of the site as equally direct alternative paths are provided. ATE would like to seek a commitment that all other proposed paths are at least 2m wide, well lit, and made of a smooth, sealed surface throughout. Additionally, the final design should consider surveillance, ensuring paths are overlooked. ATE would also question whether the emergency access can be narrowed to provide a more direct and comfortable crossover for pedestrians and cyclists at this location.

ATE supports the proposed 20mph site speed limit but would welcome details on design considerations to achieve this.

On-site facilities

ATE regards the proposed cycle parking provision of one space per bedroom to be acceptable and is in line with KCC's parking standards. However, all cycle parking should be within the building footprint of the house or garage. ATE does not consider sheds or rear gardens to be acceptable cycle parking provision as this introduces unnecessary friction to cycling as a means of transport and invites theft. Additionally, the use of sheds as cycle parking competes with gardening tools, barbeques and other items which make them inappropriate as cycle stores. ATE reminds the applicant of their obligation to "give priority first to pedestrian and cycle movements" (NPPF 117) and providing easily accessible and secure cycle parking, ideally situated at the front of the dwelling, is part of this obligation. ATE requests more details regarding the proposed contributions to cycle parking at Meopham station. This is strongly supported by ATE, and the applicant is encouraged to consider whether secure parking would be feasible. This would need to be discussed with Southeastern Railway, who already operate several secure facilities across their network. ATE would like to be notified of the result of these discussions and any proposals should be committed to as part of the reserved matters and secured by an appropriate condition. ATE recommend the applicant discuss with KCC Highways whether cycle parking can be provided at Camer Parade, as this is likely to be a major trip generator.

Next steps

ATE requests this advice be shared with the LPA case officer, agent and applicant. ATE would be content to review further submitted information to help address the identified defects, with a view to providing a further response and recommended wording for planning conditions and obligations.