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Highways and Transportation
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Tel: 03000 418181
Date: 26 January 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 consultation in relation to the above planning application. Kent County Council Highways (KCC) has the following comments to make with respect to highway matters.

Transport Assessment (ref: GS/TV/AH/35213, November 2025 (TA) - General Comments

A vision-led assessment has been set out, which is welcomed. However, KCC questions some of the statements supporting this vision and these concerns are set out in more detail below.

Walking and Cycling

A walking and cycling audit has been undertaken of five routes within Istead Rise and this is welcomed. However, the report does not refer to the lack of dropped kerbs at the A227 / Istead Rise junction and no assessment has been undertaken of the A227 which is a key route for connections to Meopham Station, Meopham Secondary School and Gravesend. The audit has also not included a number of considerations requested in the KCC pre-app response, including severed links, lack of cycleway (and where there is a lack of cycle routes, whether it is considered suitable to cycle on carriageway for all users including children accessing schools) and whether secure cycle parking is provided at destinations (e.g. the Parade only has a single cycle parking space).

Paragraph 2.3.7 of the TA states there is a direct cycle route north into Gravesend (along the A227). However, the shared route referred to is not particularly high quality, is not lit and is in need of resurfacing. However, the more fundamental issue is that the route is severed to the north of The Tollgate bridge. At this point pedestrians must cross three lanes of heavily trafficked carriageway, which is difficult and raises safety concerns. No crossing is currently provided. The footway along the A227 south of Istead Rise is also severed before it reaches Meopham, so no connection to the station or other facilities, can be made by pedestrians, and can likely only be made by the most confident of cyclists who choose to cycle on the high speed (50mph) carriageway. Taken together, these factors mean that walking and cycling outside of Isted Rise itself are unlikely to be realistic or attractive choices for most residents, particularly children, older people and those with mobility impairments.

Some local facilities are available at the shopping parade, 600m from the site boundary, although access to these facilities is via Upper Avenue which is relatively steep and therefore unlikely to be suitable for a number of residents. Facilities include a convenience store, pharmacy, a butcher, a 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 adjacent to the site and a secondary school is located within 4.8km to the south in Meopham. However, the information contained within the Design and Access Statement states these schools are soon to be oversubscribed and will not be able to accommodate the demand of 45 primary school and 32 secondary school places anticipated to be needed. Therefore, residents would need to travel out of the area to access schools. 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.

A pedestrian, cycle and emergency vehicle access will be created between the site and Long Walk, which is welcomed as this will increase the site's permeability. However, the Parameter Plan shows a 'landscape buffer' in this location, which would prevent the new access being formed. The Parameter Plan must be updated.

The Illustrative Masterplan shows a pedestrian route towards the centre of the site connecting to Downs Road. This is also welcomed. Where possible, this should cater for both pedestrians and cyclists.

In the absence of an existing strategic cycling plan for this rural area of Gravesham, KCC, on behalf of Gravesham Borough Council (GBC) have recently commissioned Jacobs to design a high-level cycle scheme between (1) Istead Rise and Meopham Station and (2) Meopham Station to Meopham Secondary School. In order to support cycling between the site and facilities in Meopham, a financial contribution should be provided towards the detailed design and construction of the new cycle scheme, in the event that one is found to be achievable.

Public Transport

Bus stops are located within 400m of the site, which is acceptable. However, there are no bus shelters and they are only served by one service - the 308 between Gravesham and Sevenoaks. The 308 has a significantly limited service Monday-Saturday with no commuter service from Istead Rise during the AM peak, only one commuter service in the PM peak (the return from Gravesham only), and no services at all on a Sunday. Service 308 currently requires subsidy, indicating commercial unsustainability. The existing level of provision is inadequate and must be improved. KCC are continuing discussions with the applicant on this fundamental matter.

The nearest railway station is located 2.4km to the south of the site in Meopham. As set out under 'walking and cycling', this is not accessible by either pedestrians or less confident cyclists. The 308 bus does not provide services to the station during the AM peak hour leaving the only realistic option of travel by car. In line with paragraph 110 of NPPF, this does not provide a genuine choice of travel modes and for what is likely to be a frequent journey.

Crash Data Assessment

A crash data assessment has been provided for the five-year period to 30th June 2025. The assessment is acceptable.

Vehicle Access

Vehicle access to the site will be taken from Downs Road in the location of the existing access to numbers 64, 68 and 70. Please can the applicant confirm that the gradient of the site access meets the Kent Design Guide levels.

The speed data shows that vehicles are currently speeding along Downs Road, with 85th percentile speeds of 34.6mph northbound and 31.9mph southbound, against a speed limit of 30mph. Proposals have been set out to try and reduce the existing speeds and these are set out later in this response under 'Off-site Highway Improvements'.

Visibility splays of 47m to the north and 53m to the south (in line with the 85th percentile speeds), are achievable and can be seen on plan H-01 Rev P4 in Appendix H. The presence of the existing northbound bus stop to the south of the access, lies within the visibility splay which is not recommended. However, a Road Safety Audit (RSA) has been undertaken (provided in Appendix J) and this was not one of the issues raised by the Auditor.

Double yellow lines are proposed to be implemented within the splay to prevent vehicles parking within in. Whilst KCC do not object to this proposal at this planning stage, this would require a Traffic Regulation Order and is therefore subject to separate consultation and approval.

An emergency access will be provided at Long Walk. This will allow for pedestrian and cycle connections but will prevent regular vehicle access through the installation of a bollard. This is welcomed. As access is not a reserved matter, the proposal should be shown on a scaled plan with appropriate dimensions. The existing footway along Long Walk terminates just before the site boundary. The footway should be extended to meet the proposed footway within the site to create a continuous connection, or as a minimum, where this cannot be provided due to lack of space for vehicles using the turning head, a dropped kerb should be provided to allow pedestrian access to the existing footway.

Vehicle tracking for an 11.3m refuse vehicle has been provided in Appendix H and is acceptable.

Parking

Parking is proposed to be provided in line with parking standards which is acceptable. The provision of one active electric vehicle charging point per unit is welcomed.

Off-site Highway Improvements

A number of off-site highway improvements are proposed. These include:

- Raised kerbs at the southbound and northbound bus stops on Downs Road, adjacent to the access (as shown on plan H-01 Rev P4 in Appendix H);
- Raised kerbs at the Long Walk, Upper Avenue and primary school bus stops (not shown on the plans);
- A bus shelter at the Downs Road southbound stop (as shown on plan H-01 Rev P4 in Appendix H);
- Refresh the red surfacing on the Downs Road carriageway outside the site access and school (not shown on the plans);
- Dropped kerbs on the school access road (as shown on plan H-01 Rev P4 in Appendix H);
- An uncontrolled crossing point across both the site access and Downs Road (as shown on plan H-01 Rev P4 in Appendix H); although no visibility splays are shown and are required;
- A connection to Downs Road via the existing pedestrian link and an uncontrolled crossing point at the junction with Downs Road, across from 137 Downs Road (as shown on plan H-02 Rev P1 in Appendix H). The existing access appears to be a vehicle

crossover. A bollard should be provided to prevent future vehicle access and the excess kerb should be reinstated where not required for the new crossing;

- Vegetation removal within the visibility splays, as per the RSA recommendation (not shown on the plans);
- An emergency vehicle, pedestrian and cycle access connection to Long Walk (not shown on the plans).

Plans H-01 Rev P4 and H-02 Rev P1 should be updated to reflect all of the above proposals and should be conditioned to any permission granted.

Trip Generation and Distribution

The proposed vehicle trip rates and resulting anticipated trip generation are set out in tables 5-1 and 5-2 of the TA respectively. The site is anticipated to generate 84 two-way trips in the AM peak and 82 two-way trips in the PM peak. Whilst these trips are generally considered appropriate for a development of this size, the trips do not correspond with the trip rates and the trip rates do not match those in the TRICS output in Appendix K. There is also concern that the sites have not been filtered appropriately.

Trip rates for non-car modes have been provided in the Interim Travel Plan and, based on 2011 Census data, show that there are anticipated to be 92 daily trips by rail, 24 on foot, three by cycle and 29 by bus. The low percentage of people travelling by foot, cycle and bus is likely reflective of the site's existing accessibility issues.

A five percent reduction in vehicle trips is proposed to be achieved through the vision-led approach. However, this is below the 10% mode shift typically seen in Travel Plans and supports KCC's concerns that there are limited opportunities for genuine choice of travel modes. It is assumed that the trip generation used in the following junction assessments is based on the TRICS data and has not been reduced by 5% to account for the vision. Please can the applicant confirm if this assumption is correct.

Vehicle trips have been distributed using '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', and Google journey planner. This method is acceptable.

Junction Capacity Assessments

The applicant has not used the Kent Transport Model, as KCC previously requested.

The KCC pre-app response stated *"The site was not included in the Gravesham Core Strategy, which is the currently adopted Local Plan, and therefore the impact on the wider network has not been assessed and approved. It also needs to be considered in line with other emerging sites. Traffic modelling should therefore be undertaken using the KTM (or the closely associated Gravesham Transport Model (GTM)), then, using the outputs, be followed by local junction modelling for junctions which are likely to be over capacity in the 'with development' scenario."* However, this approach has not been taken by the applicant, who has referred to the KCC Transport Assessment and Travel Plan Guidance document, 2025 and quoted *"For larger developments (typically those over 200 units / 2000 sqm and larger sites not allocated in the Local Plan), use of the strategic Kent Transport Model is likely to be required..."* However, the wording leaves opportunity to include smaller sites where necessary. In the absence of such an assessment, KCC cannot advise whether the development would result in severe residual cumulative impacts, nor whether appropriate mitigation can be identified or secured. Local junction modelling in isolation does not provide sufficient confidence that wider network impacts have been appropriately captured, particularly where multiple large developments are proposed within the same catchment.

In addition to this application, there are live applications for 720 units in the local area and additional applications for significant numbers of houses are likely to be submitted imminently. These live applications represent reasonably foreseeable development and must therefore be considered as part of any assessment of residual cumulative impacts.

In line with paragraph 116 of the National Planning Policy Framework (NPPF), KCC need to determine whether the residual cumulative impacts would be severe and whether, where necessary, appropriate mitigation has been proposed. Without a cumulative assessment KCC is unable to determine this and would also be unable to seek mitigation or S106 contributions as the scale and necessity of mitigation cannot be defined. If the applicant does not wish to wait for the Local Plan evidence base, it is imperative that the cumulative impacts of other sites are assessed for the 2042 scenario. To ensure consistency with other applications in the local area, this assessment should be undertaken using the Kent Transport Model. The sites to be included should be discussed with KCC and GBC.

The following local junctions have been modelled for capacity using local junction models:

- (1) Site access junction with Downs Road;
- (2) Downs Road / Arcadia Road priority junction;
- (3) Downs Road / Upper Avenue priority junction;
- (4) Lewis Road / A227 Wrotham Road priority junction;
- (5) Istead Rise / A227 Wrotham Road priority junction; and
- (6) A2 / A227 Wrotham Road roundabout.

The junctions have been assessed for the following scenarios:

- 2025 Base;
- 2030 'Do Nothing';
- 2030 'Do Minimum' (With Development);
- 2030 'Sensitivity Test' (as per the 'Do Minimum' scenario, plus 1000 units).

Traffic data was obtained from Automatic Traffic Counters undertaken on the week commencing 8th March 2025, and turning movement counts undertaken on the 14th October 2025. Survey data for the A2 / A227 junction was obtained from a previous application, and is dated 24th October 2024. It is noted that the latter would have been undertaken during the school half term and may not therefore be considered valid.

TEMPro growth factors have been applied from 2025 – 2030. However, the baseline was 2024 not 2025. All future base models should be based on a 2042 scenario which is the end of the emerging Local Plan period. Assessing impacts to 2030 risks materially understating peak period congestion and cumulative effects over the plan period.

The junction model results show that the junctions are predicted to work well within capacity in both the AM and PM peak period, in the '2030 Do Minimum' scenario.

In lieu of using the Kent Transport Model, a sensitivity assessment has been undertaken at the A227 / Lewis Road and A227 / Istead Rise junctions, assuming an additional 1000 dwellings come forward in the local area and route via the A227. The results show that the Lewis Road junction is predicted to operate above the desired 0.85 RFC in the AM peak, with an RFC of 0.86 and a queue of five vehicles. It is predicted to operate within desired capacity during the PM peak. The Istead Rise junction is predicted to operate above theoretical capacity (RFC 1.0) in both the AM and PM peak periods with RFCs of 1.18 and 1.07 and queues of 26 and 14, respectively. KCC do not agree with the applicant's conclusion that the junction can accommodate this increase as drivers would split between Lewis Road and Istead Rise, and that there will be a "*significant modal shift*." Table 6.12 of the TA contradicts the applicant's

statement as the Lewis Road junction is already predicted to operate above desired capacity in the sensitivity assessment scenario, without re-routing of additional traffic from the Istead Rise junction. In addition, the 5% reduction in car-based trips proposed under the vision-led proposals does not support the significant modal shift stated. Mitigation is likely to be required at this junction.

The assessment of the A2 / A227 Wrotham Road roundabout showed that with the mitigation secured under application GBC/20141214, the junction is anticipated to operate within capacity during the AM and PM peaks under the '2030 Base', '2030 Do Nothing' and '2030 Do Minimum' scenarios. However, an assessment has not been undertaken to demonstrate the impact of the '2030 Sensitivity Test' and therefore the impact of the combined developments is unknown. As above, the future baseline assessment should be based on the emerging Local Plan timescale of 2042. The junction itself is maintained by KCC with the A2 slip roads being maintained by National Highways (NH). It is noted that in their 19th January 2026 response to the application, NH have requested further information from the applicant regarding committed developments, crash data, geometry, layout and model adjustments. KCC will review this and NH's response when it becomes available.

As per the Transport Assessment and Travel Plan Guidance document, 2025, plans showing the geometry used for the junction modelling should have been provided for review. However, the geometry stated in the output tables seems reasonable.

Policy

Paragraph 4.8.1 of the TA states "*The proposed development is seen to comply with all relevant national and local transport planning policies.*" However, this is questioned as:

- Referring to NPPF paragraph 110, the TA paragraph 4.1.3 states "*Significant development should be focused on locations which are or can be made sustainable, through limiting the need to travel and offering a genuine choice of transport modes. This can help to reduce congestion and emissions, and improve air quality and public health. However, opportunities to maximise sustainable transport solutions will vary between urban and rural areas, and this should be taken into account in both plan-making and decision-making.*" As mitigation to address these accessibility constraints has not yet been identified or secured, the development cannot currently be said to offer a genuine choice of transport modes, contrary to the NPPF.
- Referring to NPPF paragraph 115, the TA paragraph 4.1.4 states "*Sustainable transport modes are prioritised taking account of the vision for the site, the type of development and its location; Safe and suitable access to the site can be achieved for all users; ... Any significant impacts from the development on the transport network (in terms of capacity and congestion), or on highway safety, can be cost effectively mitigated to an acceptable degree through a vision-led approach.*" In addition to the access issues, a satisfactory cumulative impact assessment has not yet been undertaken to determine the impact.
- Referring to NPPF paragraph 116, the TA paragraph 4.1.5 states "*Development should only be prevented or refused on highways grounds if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the road network, following mitigation, would be severe, taking into account all reasonable future scenarios.*" This cannot yet be determined.
- Referring to NPPF paragraph 117a, the TA paragraph 4.1.6 states [Development should] "*Give priority first to pedestrian and cycle movements, both within the scheme and with neighbouring areas; and second – so far as possible – to facilitating access to high quality public transport*". "Address the needs of people with disabilities and reduced mobility in relation to all modes of transport;"... "Create places that are safe, secure and

attractive – which minimise the scope for conflicts between pedestrians, cyclists and vehicles.” It is considered that the proposals are not yet in line with this policy.

- Referring to NPPF paragraph 155c, the TA paragraph 4.1.9, states *“The development would be in a sustainable location, with particular reference to paragraphs 110 and 115 of this Framework.”* KCC do not agree that the site is currently sustainable; further work is required.
- Referring to the Planning Practice Guidance, 2014, the TA paragraph 4.2.2, states *“The Transport Assessment or Transport Statement may propose mitigation measures where these are necessary to avoid unacceptable or “severe” impacts.”* This requirement cannot yet be determined.
- Referring to DfT Circular 01/2022 paragraph 12, the TA paragraph 4.3.3 states *“New development should be facilitating a reduction in the need to travel by private car and focused on locations that are or can be made sustainable.”* Paragraph 48 states *“Where such development has not been identified in an up-to-date development plan (or an emerging plan that is at an advanced stage), developers should demonstrate that the development would be located in an area of high accessibility by sustainable transport modes and would not create a significant constraint to the delivery of any planned improvements to the transport network or allocated sites.”* The site is not currently one of ‘high accessibility’ and the cumulative impact assessment has not yet been completed.
- Referring to GBC’s Local Plan Core Strategy 2014 paragraph 2.6.4, the TA paragraph 4.5.3 states *“There will be a need to ensure that new development is mixed use, is located in areas with best access to services and facilities which minimise the need to travel, particularly by car and minimises impacts on the road network...”*. The adherence to this policy is questioned.
- No reference is made to the Gravesham Design Code. However, section 3.11 of the Code is titled *“Future for the rural areas?”* and states, *“Promote a sustainable network of unique villages co-locating key community facilities and commercial activities and better connected by pedestrian and cycling routes and by excellent, cost-effective public transport” and “Improved pedestrian and cycling permeability throughout each village”*. The proposals do not currently align with the Design Code.

In summary, the proposals do not currently comply with national or local transport policy in relation to sustainable location, accessibility, cumulative impact assessment, or prioritisation of sustainable modes. Further discussions with the applicant on overcoming these issues, are welcomed.

Interim Travel Plan (ref: GS/TV/AH/35213, November 2025 (TP))

The Travel Plan target aims to reduce car-based trips by only 5% over a five-year period. This is below the 10% reduction usually seen in Travel Plans and reflects the site’s rural location.

A baseline mode share survey is proposed to be undertaken within three months of occupation of the site. However, the KCC Transport Assessment and Travel Plan Guidance document, 2025, states *“Targets should be set based on the traffic generation outlined within those documents, as a starting point, as this level of traffic generation was assessed and approved at planning.”*

The Travel Information Pack (TIP) will play a key role in residents’ modal choice. It should contain web links to real time information, estimated journey times to key destinations, information on car sharing and the nearest car clubs, and the offer of personalised travel planning. The TIP should be updated following any changes that have occurred, and should be distributed on day one, and at another point during the lifetime of the Travel Plan should annual targets not be on-track to be achieved.

Trees

A number of KCC maintained trees are located adjacent to the site access however, these do not appear to be included within the scope of the tree survey. Confirmation is required as to whether they have been evaluated and that they will be protected if construction takes place. If any of the trees are proposed to be removed or are damaged during construction, then the full CAVAT fees would be sought.

Drainage

The surface water system is proposed to be maintained by a private management company and therefore cannot be proposed to be adopted by the Highway Authority.

Summary and Conclusion

In summary, KCC's concerns relate to the site's poor non car accessibility, the absence of a robust cumulative transport assessment in the context of significant nearby growth, and uncertainty that the local highway network can safely accommodate the development without further mitigation.

KCC would like to place a holding objection on the application until the above issues have been resolved.

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.