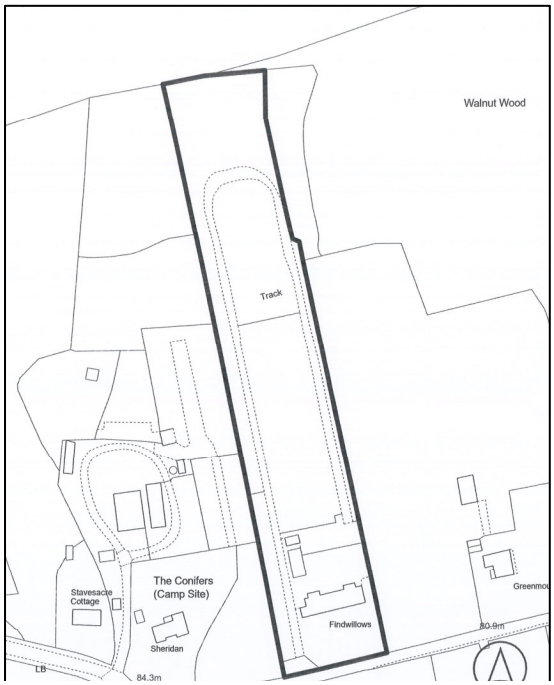
Proposed Office Development, Walnut Hill Nursery, Gravesend, Kent, DA13 9HL

Transport Statement

August 2025



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Walnut Hill Nursery

Transport Statement

August 2025

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1 Introduction

1.1 PT Planners (PTP) has been appointed to advise on the access and transport issues associated with development proposals at the Walnut Hill Nursery, Walnut Hill Road, Gravesend, Kent, DA13 9HL. The site has a commercial plant nursery use. The site was the subject of enforcement action undertaken by Gravesham Borough Council, notice Ref: 24/00190/COU, which was subsequently appealed. The enforcement did not relate to the commercial plant nursery use. The notice outlined a number of reasons for enforcement action being taken with the following relating to highway matters.

"Walnut Hill Road and Nash Bank are narrow in width with a lack of passing places, poor forward visibility, no pedestrian facilities and no street lighting unsuitable for the increased movement of traffic including HGVs, associated with the unauthorised use. The unauthorised use would be detrimental to highway safety, contrary to the requirements of Policies T1, T5 and P3 of the Gravesham Local Plan First Review 1994, Policy CS11 (Transport) of the Gravesham Local Plan Core Strategy 2014, and Section 9 (Promoting sustainable transport), including paragraph 115, of the National Planning Policy Framework 2023."

1.2 Following the appeal of the notice Ref: APP/K2230/C/25/3358530, the Planning Inspector upheld the enforcement action and refused to grant planning permission for the site activities subject to the notice. Within the appeal decision, in relation to transport issues, the Inspector reasoned that the activities subject to the notice generated a significant number of commercial vehicle movements. For this reason the Inspector concluded that the site could not provide safe or suitable access given the nature and geometry of Walnut Hill Road and Nash Bank. In relation to highway safety the inspector raised the primary concern that the local road network was not suitable to accommodate significant commercial vehicle movements generated by the site, especially in relation to the large size of vehicles (HGV's). The Inspector then concluded that the continued use of Walnut Hill Road and Nash Bank by traffic generated by the activities subject to the notice would be detrimental to the safety and the flow of traffic. In conflict with Policies T1 and T5 of the Gravesham Local Plan First Review 1994 (the 'LPFR'), and Policy CS11 of the LPCS.

1.3 In relation to sustainable transport, the Inspectors decision highlighted that for activities reliant on significant commercial vehicle movements, the site cannot be deemed to be in a location where sustainable transport options offer an alternative. In this respect the Inspector concluded that a continuation of the existing site activities would not comply with paragraphs 110 and 115 of the NPPF.

1.4 This Transport Statement (TS) has been prepared in support of a planning application proposing existing buildings being occupied as offices within the front section of the site adjacent to Walnut Hill Road. It provides the information required to fully assess the highway safety and transport impacts of the development in relation to Walnut Hill Road and Nash Bank. It also considers whether the proposed site use complies with the Gravesham Borough Council and NPPF transport policies referenced within the enforcement notice and the Inspectors Decision. In addition, the sustainable transport and highway safety issues specifically raised within the Inspectors Decision have been considered. The TS demonstrates that:

- An office use of the scale proposed will generate limited weekday peak hour traffic at a level which is significantly below the accepted traffic assessment thresholds. In addition, Walnut Hill Road is also very lightly trafficked.

- The proposals will result in a significant reduction in commercial vehicle traffic using the site and local highway network when compared with the existing lawful commercial plant nursery use. An office use will therefore be beneficial in highway safety terms through the removal of commercial vehicle movements, including HGV's, from the site and surrounding highway network. In this respect the proposals will fully address the highway safety concerns previously raised by the borough council and within the Inspectors Decision.

- In relation to the Walnut Hill Road and Nash Bank the existing road alignment, road widths and forward visibility has acted to reduce vehicle speeds which is beneficial in highway safety terms. This is reflected in the accident history for both these highways as no Personal Injury Collision (PIC) accidents have been recorded over the most recent 5 year period. In addition, both Walnut Hill Road and Nash Bank benefit from a significant number of highway passing places.

- A review of the site accessibility by modes of transport other than the car demonstrates that it is located within walking and a short cycling distance of public transport (bus) services and within a short cycling distance of extensive residential areas including Gravesend. Rail services are also accessible by cycle. In addition, the proposed office use will be no less sustainable in transport terms than existing lawful commercial use.

- Given the limited level of peak period traffic generated by the proposals, the lack of any accident record over the local highway network and a significant reduction in commercial vehicle movements, it is reasonable to conclude that the proposals will not have a severe impact on highway capacity or be detrimental to highway safety as defined by paragraph 116 of the NPPF.

- The proposals will comply with the relevant Gravesham Borough Council and NPPF transport policies referenced within the enforcement notice and Inspectors Decision.

1.5 Following this introduction the TS is structured as follows:

Section 2.0, Existing Conditions: Provides a description of the site, the surrounding area and the local highway network and reports on the accident history over the local network. This section also details the number of weekday peak period and daily vehicle movements associated with the existing lawful site use.

Section 3.0, Development Proposals and Transport Issues: Provides details for the scheme and makes predictions for the level of weekday peak hour and daily traffic generated by the proposed office use using suitable TRICS comparison sites. The potential impact of traffic associated with the proposals has then been assessed with reference to the relevant traffic assessment thresholds and the change in traffic predicted when compared with the existing site use.

Section 4.0, Policy Context: Reviews the local and national transport policies referenced within the enforcement notice / Inspectors Decision and considers if the proposals will comply with policy.

Section 5.0, Summary and Conclusions: Presents a summary of the report and draws together its conclusions.

2 Existing Conditions

Development Site

2.1 The Walnut Hill Nursery, is located adjacent to and to the north of Walnut Hill Road approximately 400m to the east of the New Barn built up area. The site falls under the jurisdiction of Gravesham Borough Council as the local planning authority with Kent County Council being the local highway authority. It comprises the buildings and indoor / outdoor planting areas associated with a former commercial plant nursery plus extensive hardstanding areas used for vehicle parking, turning and deliveries. It is currently accessed via a wide surfaced crossover and access road connecting to the northern side of Walnut Hill Road. The existing layout has been designed to accommodate two-way traffic and commercial vehicle movements as illustrated by **Image 2.1.**

Image 2.1: Walnut Hill Road Site Access

2.2 The site owner has confirmed that the existing on-site parking / servicing areas and access has operated without any recorded highway capacity or safety issues.

2.3 The site is bounded to the north by agricultural land, to the south by Walnut Hill Road, to the east by woodland and to the west by a camping / caravan site. The

site location can be seen at **Figure 2.1** with the existing site layout shown at **Appendix A.**

Former / Existing Site Use

2.4 Until recently the site operated as a commercial plant nursery involving both retail and trade sales. It is understood that this business vacated the site approximately 2 years ago. This existing site use which could resume, has therefore the potential to generate traffic using the site access and the wider highway network. This traffic includes commercial vehicle movements associated with the deliveries of plants and materials. It is understood that the nursery traded 7 days a week i.e. during both weekdays and at weekends. The existing buildings that would be occupied as offices have a combined total floor area of 685 sqm. The existing areas schedule can also be seen at **Appendix A**.

Existing Site Use Traffic Generation

2.5 To determine the existing site use traffic generation a TRICS based assessment has been undertaken based on the commercial plant nursery business which recently operated from the site. Trip predictions have been derived from suitable garden centre sites provided by the TRICS Database for weekday 08.00-09.00 and 17.00-18.00 peak hour periods. Daily rates have also been derived. **Table 2.1** illustrates the vehicle trip rates per 100 sqm GFA derived and **Table 2.2** illustrates the existing site use traffic generation with these rates applied to the site floor areas formerly occupied by the commercial plant nursery which is 685 sqm. The full TRICS data including the selection parameters used can be seen at **Appendix B.**

Table 2.1: Existing Site Use (Commercial Plant Nursery) Vehicle Trip Generation

	Trip Rate (Per 100 Sqm GFA)		
Time Period	**Arrivals**	**Departures**	**Totals**
Weekday 08.00-09.00	0.351	0.054	0.405
Weekday 17.00-18.00	0.108	0.270	0.378
Weekday Total	7.459	7.487	14.946

Table 2.2: Existing Site Use Traffic Generation

Time Period	Vehicle Movements		
	Arrivals	Departures	Totals
Weekday 08.00-09.00	3	0	3
Weekday 17.00-18.00	0	3	3
Weekday Total	51	51	102

2.6 As set out at **Table 2.2**, using TRICS comparison sites, it has been calculated that the existing site use, if it were to resume, would generate 3 vehicle movements during weekday peak hour periods, with a significant number of vehicle movements (102) generated on each day in total. These figures include commercial vehicle movements associated with the deliveries of plants and materials. A review of garden centre site surveys within TRICS suggests that commercial vehicle movements, including HGV's, typically comprise 5% of daily trips, resulting in the existing site use typically generating 5 commercial vehicle movements per day on weekdays.

Local Highway Network

2.7 The review of the highway network in the vicinity of the site focuses on Walnut Hill Road and Nash Bank between the site and the A227 Wrotham Road to the east. This study area was selected as these two sections of highway have been specifically referenced within the enforcement notice and Inspectors Decision.

2.8 Walnut Hill Road is a rural highway which provides a route between the site, New Barn to the West and Nash Bank leading to the A227 to the east. At the site frontage and along the majority of the route to the A227 Walnut Hill Road is subject to a 30 mph speed limit. There are no footways or street lighting along this route. Approximately 450m to the east of the access Walnut Hill Road transitions to Nash Bank where the speed limit increases to 60 mph. Nash Bank continues east for a further 300m and terminates at a priority junction with the A227 Wrotham Road. The entire length of the route between the site access and the A227 is approximately 750m. The A227 carries traffic between Wrotham in the south and Gravesend to the north. En route to these destinations this route provides access to the M20 and A2 respectively.

2.9 Both Walnut Hill Road and Nash Bank are single track roads but benefit from numerous passing places. Within its enforcement notice Gravesham Borough Council has made reference to a lack of passing places as a reason for raising highway safety concerns in relation to the existing site use. To establish whether this is the case an audit of the highway route between the site and A227 has been undertaken to determine the number and location of places where two vehicles can pass. The results of this exercise can be seen at **Drawing 21518/01** which illustrates that there are at present a total of 17 passing places available between the site and A227. These are a combination of formal passing bays and informal areas where the carriageway is sufficiently wide for two vehicles to pass, such as side road entrances. For the purpose of the audit a passing place has been defined as a location with a minimum 4.8m width that is sufficient for a car and HGV to pass in accordance with guidance set out within the Manual for Streets.

2.10 The distance between each passing location is short, typically in the range 30m – 60m. This is in accordance with the forward visibility requirements outlined within the Manual for Streets and Kent Design Guide standards for routes such as Walnut Hill Road and Nash Bank which are subject to 30 mph or lower vehicle speeds. Site observations suggest that the existing road widths, alignment and geometry along Nash Bank which is subject to a 60 mph limit acts to reduce vehicle speeds to a level significantly below the limit and more in keeping with a 30 mph speed zone. In this respect the existing route characteristics between the site and A227 should be considered beneficial in highway safety terms by encouraging lower vehicle speeds.

2.11 To establish if the site access and Walnut Hill Road / Nash Bank have incurred any reported highway safety issues the Personal Injury Collision (PIC) data available from Crashmap for the most recent 5 year period has been reviewed. An analysis of the data confirms that no accidents were recorded within the study area over the 5 year period. This suggests that the existing carriageway widths, road geometry and forward visibility available along Walnut Hill Road and Nash Bank have not been detrimental to highway safety. A plot from Crashmap illustrating the accident record can be seen at **Appendix C.**

Sustainable Transport

Access on Foot

2.12 Walnut Hill Road does not provide formal pedestrian provision or access to the site however this road is very lightly trafficked and existing properties served by it use this road as a shared surface for vehicles and pedestrians. The nearest formal footways are located at Longfield Avenue and commence approximately 450m to the west of the site. The review of the PIC accident data for Walnut Hill Road / Longfield Avenue to the west of the site access confirms that no accidents were recorded over a 5 year period which suggests that the lack of formal footway provision has not raised any recorded highway safety issues.

Access by Cycle

2.13 In relation to cycle trips, the statistics published by Cycling UK for the most recent year available (2023) suggest an average cycle trip length of 3 miles which equates to 5 km. Trips by cycle will be a potential travel option for staff employed at the site. It is located within a short cycling distance of New Barn, Hook Green and further afield settlements including Gravesend can be reached within 5 km. This is a substantial catchment. In addition, for onward travel the nearest rail station, Meopham, which is located 1.5km from the site can be accessed by cycle well within 5 km. The site is therefore accessible by cycle.

Access by Bus

2.14 The application site is accessible by this mode of transport with the nearest bus stops located on the A227 Wrotham Road close to its junction with Nash Bank. These stops are located approximately 750m to the east of the site which equates to a relatively short walking time of 10 minutes. The Wrotham Road stops are served by the 306, 308 and 416 bus routes which provide services to Meopham, Sevenoaks and Gravesend. Further bus stops area available on New Barn Road to the west of the site which are served by the 489 route operating between New Ash Green and Gravesend.

Access by Rail

2.15 The nearest rail station to the site is Meopham which is accessible within a short cycle or bus journey. The station is located on the Chatham Main Line with train services operated by Southeastern to London Victoria, Gillingham and Dover Priory via Canterbury East. Service frequencies are high with typically 5 trains per hour during weekday peak periods.

2.16 Within the enforcement notice and Inspectors Decision it was suggested that that a continuation of a commercial vehicle based site use would be contrary to the relevant policies and guidance on sustainable transport outlined within the Gravesham Local Plan and NPPF. For the proposed office use overall, the review of the site accessibility by modes of transport other than the car demonstrates that it is located within walking and a short cycling distance of public transport (bus) services and within a short cycling distance of extensive residential areas including Gravesend. Rail services are also accessible by cycle. In addition, it should be recognised that the proposed office use is no less sustainable in transport terms than the existing commercial plant nursery use which could resume at the site.

3 Development Proposals and Transport Issues

3.1 This section of the report provides a summary of the development proposals and considers the potential impact in traffic and highway safety terms associated with the 685 sqm floor space at the site being occupied by an office use when compared with the existing lawful use which could resume at the site. It makes predictions for the number of weekday peak hour and daily vehicle movements generated by the proposals and calculates the change in site vehicle movements when compared with existing use. It then establishes if any changes in site traffic levels will be of a sufficient magnitude to impact on the operation of the site access and the local highway network. The weekday peak hours assessed are the 08.00-09.00 and 17.00-18.00 periods when a combination of network trips and trips associated with development of the type proposed typically reach a maximum.

3.2 The potential impact of development traffic has been assessed with respect to the advice on determining the significance of development generated traffic levels published by the Department for Transport (DfT) within its "Guidance on Transport Assessment" (GOTA).

Development Proposals

3.3 The proposals involve existing buildings at the site being occupied as offices. These are located within the front section of the site adjacent to Walnut Hill Road. It is proposed that the rear section of the site will be developed for housing which is the subject of a sperate planning application. The existing site layout can be seen at **Appendix A** and illustrates that the building, parking area and access layout which will remain as existing. As outlined at Section 2 of the TS the existing access layout has been designed to accommodate two-way traffic and commercial vehicle movements far larger than that associated with the proposed use. The layout should therefore remain suitable to serve the predominantly private car traffic associated with the development and incorporates ample vehicle parking and turning areas.

Proposed Site Use Traffic Generation

3.4 To determine the traffic generation associated with the proposed office use a TRICS based assessment has been undertaken. Trip predictions have been derived from office sites provided by the TRICS Database for weekday 08.00-09.00 and 17.00-18.00 peak hour and daily periods. **Table 3.1** illustrates the vehicle trip rates per 100 sqm GFA derived and **Table 3.2** illustrates the proposed site use traffic generation with these rates applied to the 685 sqm floor space that would be occupied by offices. The full TRICS data including the selection parameters used can be seen at **Appendix D.**

Table 3.1: Proposed Office Vehicle Trip Generation

	Trip Rate (Per 100 sqm GFA)		
Time Period	**Arrivals**	**Departures**	**Totals**
Weekday 08.00-09.00	1.213	0.185	1.398
Weekday 17.00-18.00	0.062	1.437	1.499
Weekday Total	4.804	4.802	9.606

Table 3.2: Proposed Office Traffic Generation

	Vehicle Movements		
Time Period	**Arrivals**	**Departures**	**Totals**
Weekday 08.00-09.00	8	1	9
Weekday 17.00-18.00	0	10	10
Weekday Total	32	32	64

3.5 As set out at **Table 3.2**, using TRICS comparison sites, it has been calculated that the proposed office use will generates a limited number, a maximum of 10, vehicle movements during weekday peak hour periods. When compared with the existing site use traffic outlined at Section 2 of the TS the proposals would result in a small number of additional vehicle movements (7) using the site access and local highway network during weekday peak hours. Over the weekday as a whole when compared with the existing site use the proposals would result in a significant reduction in site traffic amounting to 38 vehicle movements per day.

Traffic Impact

3.6 The relevant advice on determining the significance of development generated traffic levels was published by the Department for Transport (DfT) within its "Guidance on Transport Assessment" (GOTA). Although this has been replaced by the National Planning Practice Guidance it still provides valuable advice on the thresholds for undertaking a traffic assessment and is commonly adopted by highway authorities. GOTA recommends that a detailed assessment should only be necessary at locations where traffic levels will increase by 30 or more vehicle movements per hour.

3.7 As identified above the proposed office use will during weekday peak hour periods result in a level of additional traffic at the site access and over the local highway network that is negligible and falls significantly below the GOTA assessment threshold. Over an entire weekday, this increase is more than offset by the significant reduction in site traffic levels that will occur when compared with the former commercial plant nursery operation that could resume at the site.

3.8 Office developments do not typically generate any material commercial or HGV vehicle movements. Section 2 of the TS identified that the existing commercial plant nursery site use were it to resume has the potential to generate 5 commercial vehicle movements per day. The proposals would remove this traffic from the site and local highway network which will be beneficial in highway safety terms.

3.9 Section 2 of the TS identified that Walnut Hill Road is lightly trafficked and has operated without any reported accidents over a 5 year period. Given this and the fact that the proposed use will result in a very limited increase in site traffic during weekday peak periods and a significant reduction over an entire day it is reasonable to conclude that the impact of the proposals will not be severe or detrimental to highway safety as defined by paragraph 116 of the NPPF.

3.10 The previous highway objections to a traffic generating use continuing at the nursery site raised by the borough council and within the Inspectors Decision focus primarily on the highway safety implications of commercial vehicles and

especially HGV's using the local network, namely Walnut Hill Road and Nash Bank. The office proposals will not generate any material commercial vehicle movements over this network and will result in a significant daily reduction in overall site traffic levels when compared with the existing lawful site use. For these reasons the proposals will fully address the highway safety concerns previously raised.

4 Policy Context

4.1 This section of the TS reviews the local and national transport policies previously referenced within the enforcement notice and Inspectors Decision considers if the office proposals will comply with policy.

National Policy

National Planning Policy Framework (NPPF) 2024

4.2 The NPPF adopted in March 2012 and revised most recently in December 2024 sets out the Government's overall planning policy guidance. In relation to the sustainable travel aspects of new development paragraph 110 advises that:

"The planning system should actively manage patterns of growth in support of these objectives. 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."

4.3 The transport aspects of specific development proposals are considered at paragraph 115 of the NPPF which advises that:

"In assessing sites that may be allocated for development in plans, or specific applications for development, it should be ensured that:

a) sustainable transport modes are prioritised taking account of the vision for the site, the type of development and its location;

b) safe and suitable access to the site can be achieved for all users;

c) the design of streets, parking areas, other transport elements and the content of associated standards reflects current national guidance, including the National Design Guide and the National Model Design Code48; and

d) 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."

4.4 Paragraph 116 outlines that:

"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."

Local Policy

Gravesham Local Plan First Review 1994, Saved Policies T1, T5, P3

Gravesham Local Plan Core Strategy 2014, Policy CS11 (Transport)

4.5 The Gravesham Local Plan First Review 1994 saved policies and Local Plan 2014 Core Strategy are the development plan documents relevant to the site. Saved Policy T1 deals with transport impact issues and states that:

"*The Local Planning and Highway Authorities will consider the impact on the transport system and on the environment of traffic generated by new development and will wish to ensure that all proposed developments are adequately served by the highway network identified on the Proposals Map."*

4.6 Saved Policy T5 deals with access issue and states that:

"The formation of new accesses or the intensification of use of existing accesses to the roads forming the highway network shown on the Proposals Map, will not normally be permitted, except where no danger would arise and where a properly formed access can be created in a location and to a standard acceptable to the Local Planning and Highway Authorities."

4.7 Saved Policy P3 relates to parking matters and advises that:

"The Borough Council will expect development to make provision for vehicle parking, in accordance with the Kent County Council Vehicle Parking Standards, as interpreted by Gravesham Borough Council, unless justified as an exception. All vehicle parking provision should normally be made on the development site. In the case of proposals for development in Class B1, as defined in the Town and Country Planning (Use Classes) Order 1987, the Borough Council will expect car parking provision to be made at the standard for offices and will also require lorry parking and manoeuvring areas to be provided, unless the applicant is willing to enter into an agreement to restrict the uses to which the permission relates."

4.8 Within the Local Plan Core Strategy Policy CS11 deals with development related transport issues and outlines that:

"5.5.38 New developments should mitigate their impact on the highway and public transport networks as required. As appropriate, transport assessments and travel plans should be provided and implemented to ensure the delivery of travel choice and sustainable opportunities for travel. Transport assessment work is required to be undertaken in accordance with national and local policy guidance, and to identify detailed highway and public transport network requirements and management arising from the development.

5.5.39 Sufficient parking in new development will be provided in accordance with adopted parking standards which will reflect the availability of alternative means of transport and accessibility to services and facilities."

Compliance With Policy

4.9 In relation to compliance with the NPPF guidance and Gravesham Local Plan policies, the site is accessible by sustainable transport modes as identified at Section 2 of the TS and can therefore provide safe and suitable access for all users. The site access has served the former commercial plant nursery use without any recorded highway capacity or safety issues. As identified at Section 3 of the TS the intensification of use at the site access and potential impact of traffic associated with an office use at the site will be negligible during weekday peak hour periods with a significant reduction in site traffic levels over a weekday

as a whole. Mitigation will therefore not be necessary. In relation to on-site vehicle parking and servicing areas, these are ample and will comply with the relevant borough council adopted standards.

4.10 Overall the TS has demonstrated that the proposals will not have an unacceptable impact on highway safety or result in a severe impact on the road network. In addition, set in the context of its rural location, the site is a sustainable location for the proposed use which offers a choice of transport modes. The proposed office use should therefore be considered to be in compliance with the national and local transport policies and guidance referenced within the enforcement notice.

5 Summary and Conclusions

Summary

5.1 This Transport Statement (TS) has been prepared in support of a of a planning application proposing existing buildings being occupied as offices at the Walnut Hill Nursery, Walnut Hill Road, Gravesend, Kent, DA13 9HL.

5.2 The TS has assessed the highway safety and transport impacts associated with the proposals and has also considered if the proposed use complies with the relevant Gravesham Borough Council and NPPF transport policies, including those relating to sustainable transport.

Conclusions

5.3 Further to the assessments undertaken, the following main conclusions can be drawn:

- The existing site access, a surfaced crossover to Walnut Hill Road, and on-site vehicle parking and servicing areas have operated satisfactorily for the existing site use and will continue to do so going forward with no highway safety or capacity issues being recorded.

- The site benefits from an existing lawful commercial plant nursery use and under this use formerly operated as a as a plant nursery / garden centre. Were this use to resume, a TRICS based assessment has demonstrated that the site would generate vehicle movements at the site access and over the local highway network during weekday AM and PM peak periods. The volume of traffic would be significant over a weekday as a whole, amounting to 102 vehicle movements. Under the existing use the site also has the potential to generate commercial / HGV vehicle movements.

- A further TRICS based assessment undertaken for the proposed office site use has demonstrated that during weekday peak periods the development will result in a level of additional traffic at the site access and over the local highway network that is limited and falls significantly below the accepted

traffic assessment thresholds. Over an entire weekday, this increase will be more than offset by the significant reduction in site traffic levels that will occur.

- The proposals will result in a reduction in commercial and HGV vehicle movements both at the site and over the local network. The proposals should therefore be considered to be beneficial in highway safety terms.

- In relation to the route between the site and the wider highway network, Walnut Hill Road and Nash Bank, the existing road alignment, road widths and forward visibility has acted to reduce vehicle speeds which is beneficial in highway safety terms. This is reflected in the accident history for both these highways as no Personal Injury Collision (PIC) accidents have been recorded over the most recent 5 year period. In addition, both Walnut Hill Road and Nash Bank benefit from a significant number of highway passing places.

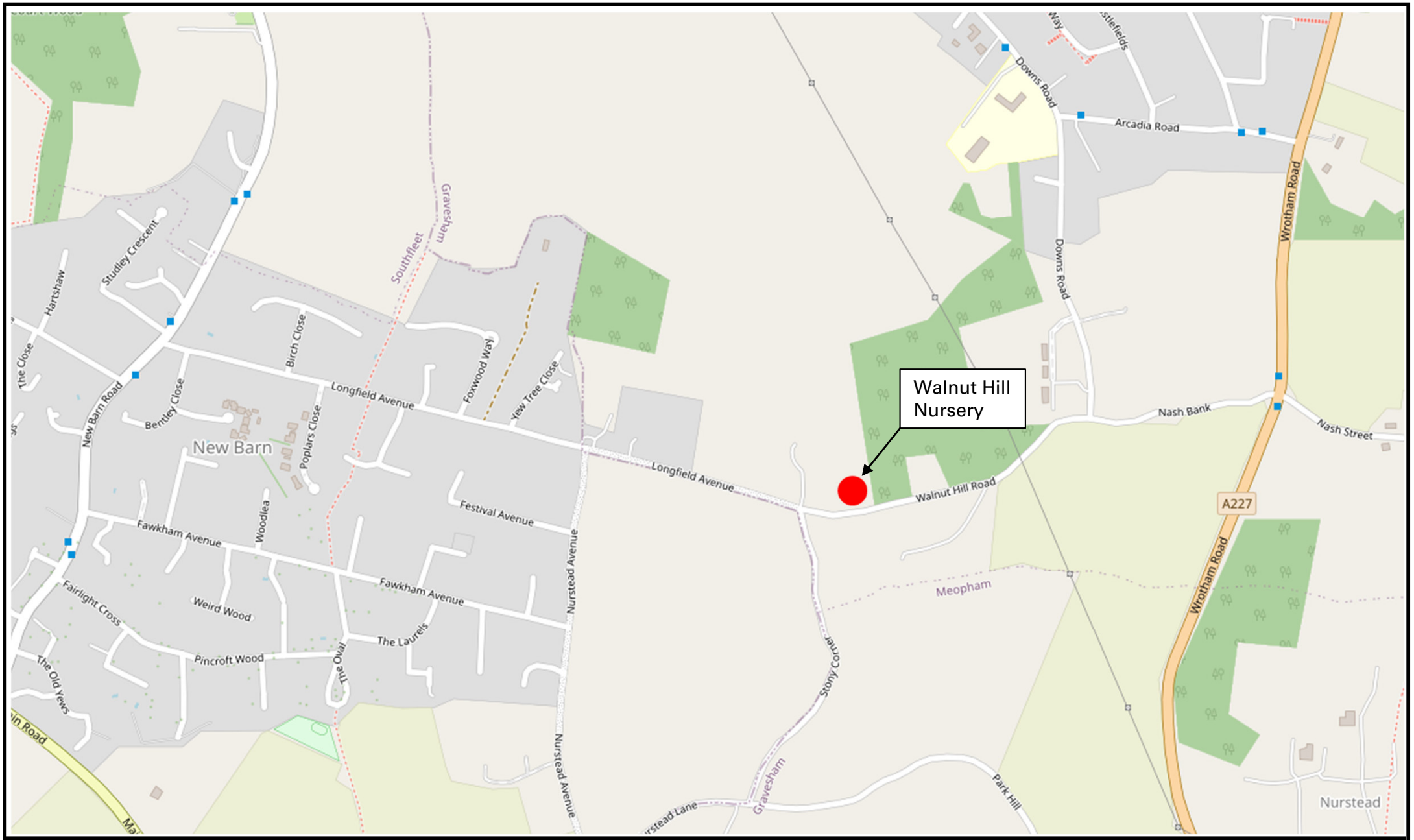
- The previous highway objections to a traffic generating use continuing at the nursery site raised by the borough council focus primarily on the highway safety implications of commercial vehicles and especially HGV's using the local network, namely Walnut Hill Road and Nash Bank. The office proposals will not generate any material commercial vehicle movements over this network and will result in a significant daily reduction in overall site traffic levels when compared with the commercial plant nursery site use. For these reasons the proposals will fully address the highway safety concerns previously raised.

- A review of the site accessibility by modes of transport other than the car demonstrates that it is located within walking and a short cycling distance of public transport (bus) services and within a short cycling distance of extensive residential areas including Gravesend. Rail services are also accessible by cycle. In addition, it should be recognised that the proposed office use is no less sustainable in transport terms than the existing commercial plant nursery.

- The proposals will comply with the relevant Gravesham Borough Council and NPPF transport policies namely Policies T1, T5 and P3 of the Gravesham Local Plan First Review 1994, Policy CS11 (Transport) of the Gravesham Local Plan Core Strategy 2014 and Section 9 (Promoting sustainable transport), of the NPPF.

- Overall the proposals will not have an unacceptable impact on highway safety or result in a severe impact on the road network as defined by paragraph 116 of the NPPF. Consequently, the proposals should be considered to be acceptable in transport terms.

Figures



SCALE: **Do Not Scale**	CLIENT: **FIRST4DRAINS**	JOB TITLE: **WALNUT HILL NURSERY, WALNUT HILL ROAD**	
DATE: **February 2025**			
DRAWN: **AR**	TITLE: **LOCATION PLAN**	JOB NUMBER: **21516**	FIGURE: **2.1**

Passing Place

Passing Place

Passing Place

DOWNS ROAD

Passing Place

Passing Place

Passing Place

A227 WROTHAM ROAD

72.1m

NASH ST

NASH BANK

63.7m

Passing Place

Passing Place

GP

49.2m

Passing Place

CUTLINE

57.6m

CUTLINE

Passing Place

Wood

Passing Place

CUTLINE

57.6m

CUTLINE

Passing Place

Wood

63.6m

Passing Place

Site Access/
Passing Place

Passing Place

Walnut Hill
Nursery Site

80.9m

WALNUT HILL ROAD

Passing Place

Passing Place

Passing Place

21518__01 2025.02.10.DWG

N

Issue	Description	Date
01	FIRST ISSUE	10.02.25

Status
PRELIMINARY
NOT TO BE USED FOR CONSTRUCTION

Scales	1:500	Current Issue Signatures	
		Author	LJS
Original Size	A0	Checker	A.RODERICK
Height Datum	O.S.	Approver	A.RODERICK
Grid	O.S.	© Copyright reserved	

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Project
WALNUT HILL NURSERY
WALNUT HILL ROAD
ISTED RISE, GRAVESEND

Title
LOCAL HIGHWAY NETWORK
WALNUT HILL ROAD/NASH ROAD
TO A227 WROTHAM ROAD

Drawing No.	Project No.	Rev
01 —	21518 —	01

100mm on Original

Appendix A

Site Location Plan

Note
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North points are indicative. ©

Existing Block Plan
1:500

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Project Title: Walnut Hill Nursery, Walnut Hill Road, Longfield Hill, DA13 9HL		Job No: 4244
Drawing Title: Existing Block Plan	Drawing No: 102	Revision: –
Date: 31.10.2024	Drawn by: MW	Checked by: PN
Scale: 1:500 @ A1	Note: –	

0 5 10 15 20 25 30
1:500 metres
N

Appendix B

Existing Site Use TRICS Data

Calculation Reference: AUDIT-848401-250204-0221

TRIP RATE CALCULATION SELECTION PARAMETERS:

Land Use : 01 - RETAIL
Category : H - GARDEN CENTRE
TOTAL VEHICLES

Selected regions and areas:

02 SOUTH EAST
HC HAMPSHIRE 1 days

This section displays the number of survey days per TRICS® sub-region in the selected set

Primary Filtering selection:

This data displays the chosen trip rate parameter and its selected range. Only sites that fall within the parameter range are included in the trip rate calculation.

Parameter:	Gross floor area
Actual Range:	2323 to 3700 (units: sqm)
Range Selected by User:	400 to 23465 (units: sqm)

Parking Spaces Range: All Surveys Included

Public Transport Provision:
Selection by: Include all surveys

Date Range: 01/01/97 to 29/06/24

This data displays the range of survey dates selected. Only surveys that were conducted within this date range are included in the trip rate calculation.

Selected survey days:

Monday	1 days

This data displays the number of selected surveys by day of the week.

Selected survey types:

Manual count	1 days
Directional ATC Count	0 days

This data displays the number of manual classified surveys and the number of unclassified ATC surveys, the total adding up to the overall number of surveys in the selected set. Manual surveys are undertaken using staff, whilst ATC surveys are undertaking using machines.

Selected Locations:

Suburban Area (PPS6 Out of Centre)	1

This data displays the number of surveys per main location category within the selected set. The main location categories consist of Free Standing, Edge of Town, Suburban Area, Neighbourhood Centre, Edge of Town Centre, Town Centre and Not Known.

Selected Location Sub Categories:

No Sub Category	1

This data displays the number of surveys per location sub-category within the selected set. The location sub-categories consist of Commercial Zone, Industrial Zone, Development Zone, Residential Zone, Retail Zone, Built-Up Zone, Village, Out of Town, High Street and No Sub Category.

Inclusion of Servicing Vehicles Counts:

Servicing vehicles Included	X days - Selected
Servicing vehicles Excluded	4 days - Selected

Secondary Filtering selection:

Use Class:

E(a)	1 days

This data displays the number of surveys per Use Class classification within the selected set. The Use Classes Order (England) 2020 has been used for this purpose, which can be found within the Library module of TRICS®.

Population within 500m Range:
All Surveys Included
Population within 1 mile:

15,001 to 20,000	1 days

This data displays the number of selected surveys within stated 1-mile radii of population.

Secondary Filtering selection (Cont.):

Population within 5 miles:

50,001 to 75,000	1 days

This data displays the number of selected surveys within stated 5-mile radii of population.

Car ownership within 5 miles:

1.1 to 1.5	1 days

This data displays the number of selected surveys within stated ranges of average cars owned per residential dwelling, within a radius of 5-miles of selected survey sites.

Petrol filling station:

Included in the survey count	0 days
Excluded from count or no filling station	1 days

This data displays the number of surveys within the selected set that include petrol filling station activity, and the number of surveys that do not.

Travel Plan:

No	1 days

This data displays the number of surveys within the selected set that were undertaken at sites with Travel Plans in place, and the number of surveys that were undertaken at sites without Travel Plans.

PTAL Rating:

No PTAL Present	1 days

This data displays the number of selected surveys with PTAL Ratings.

LIST OF SITES relevant to selection parameters

1 HC-01-H-03 GARDEN CENTRE HAMPSHIRE
ROMSEY ROAD
WINCHESTER

Suburban Area (PPS6 Out of Centre)
No Sub Category
Total Gross floor area: 3700 sqm
Survey date: MONDAY *19/11/07* *Survey Type: MANUAL*

This section provides a list of all survey sites and days in the selected set. For each individual survey site, it displays a unique site reference code and site address, the selected trip rate calculation parameter and its value, the day of the week and date of each survey, and whether the survey was a manual classified count or an ATC count.

MANUALLY DESELECTED SITES

Site Ref	Reason for Deselection
ES-01-H-03	Too Large
MO-01-H-01	Too Large

MANUALLY DESELECTED SURVEYS

Site Ref	Survey Date	Reason for Deselection
BC-01-H-02	19/09/97	Date

TRIP RATE for Land Use 01 - RETAIL/H - GARDEN CENTRE
TOTAL VEHICLES
Calculation factor: 100 sqm
BOLD print indicates peak (busiest) period

	ARRIVALS			DEPARTURES			TOTALS		
Time Range	No. Days	Ave. GFA	Trip Rate	No. Days	Ave. GFA	Trip Rate	No. Days	Ave. GFA	Trip Rate
00:00 - 01:00									
01:00 - 02:00									
02:00 - 03:00									
03:00 - 04:00									
04:00 - 05:00									
05:00 - 06:00									
06:00 - 07:00									
07:00 - 08:00									
08:00 - 09:00	1	3700	0.351	1	3700	0.054	1	3700	0.405
09:00 - 10:00	1	3700	0.270	1	3700	0.270	1	3700	0.540
10:00 - 11:00	1	3700	0.757	1	3700	0.757	1	3700	1.514
11:00 - 12:00	1	3700	1.514	1	3700	1.595	1	3700	3.109
12:00 - 13:00	1	3700	0.838	1	3700	0.838	1	3700	1.676
13:00 - 14:00	1	3700	1.000	1	3700	0.865	1	3700	1.865
14:00 - 15:00	1	3700	1.405	1	3700	0.946	1	3700	2.351
15:00 - 16:00	1	3700	0.865	1	3700	1.243	1	3700	2.108
16:00 - 17:00	1	3700	0.351	1	3700	0.649	1	3700	1.000
17:00 - 18:00	1	3700	0.108	1	3700	0.270	1	3700	0.378
18:00 - 19:00									
19:00 - 20:00									
20:00 - 21:00									
21:00 - 22:00									
22:00 - 23:00									
23:00 - 24:00									
Total Rates:			7.459			7.487			14.946

This section displays the trip rate results based on the selected set of surveys and the selected count type (shown just above the table). It is split by three main columns, representing arrivals trips, departures trips, and total trips (arrivals plus departures). Within each of these main columns are three sub-columns. These display the number of survey days where count data is included (per time period), the average value of the selected trip rate calculation parameter (per time period), and the trip rate result (per time period). Total trip rates (the sum of the column) are also displayed at the foot of the table.

*To obtain a trip rate, the average (mean) trip rate parameter value (TRP) is first calculated for all selected survey days that have count data available for the stated time period. The average (mean) number of arrivals, departures or totals (whichever applies) is also calculated (COUNT) for all selected survey days that have count data available for the stated time period. Then, the average count is divided by the average trip rate parameter value, and multiplied by the stated calculation factor (shown just above the table and abbreviated here as FACT). So, the method is: COUNT/TRP*FACT. Trip rates are then rounded to 3 decimal places.*

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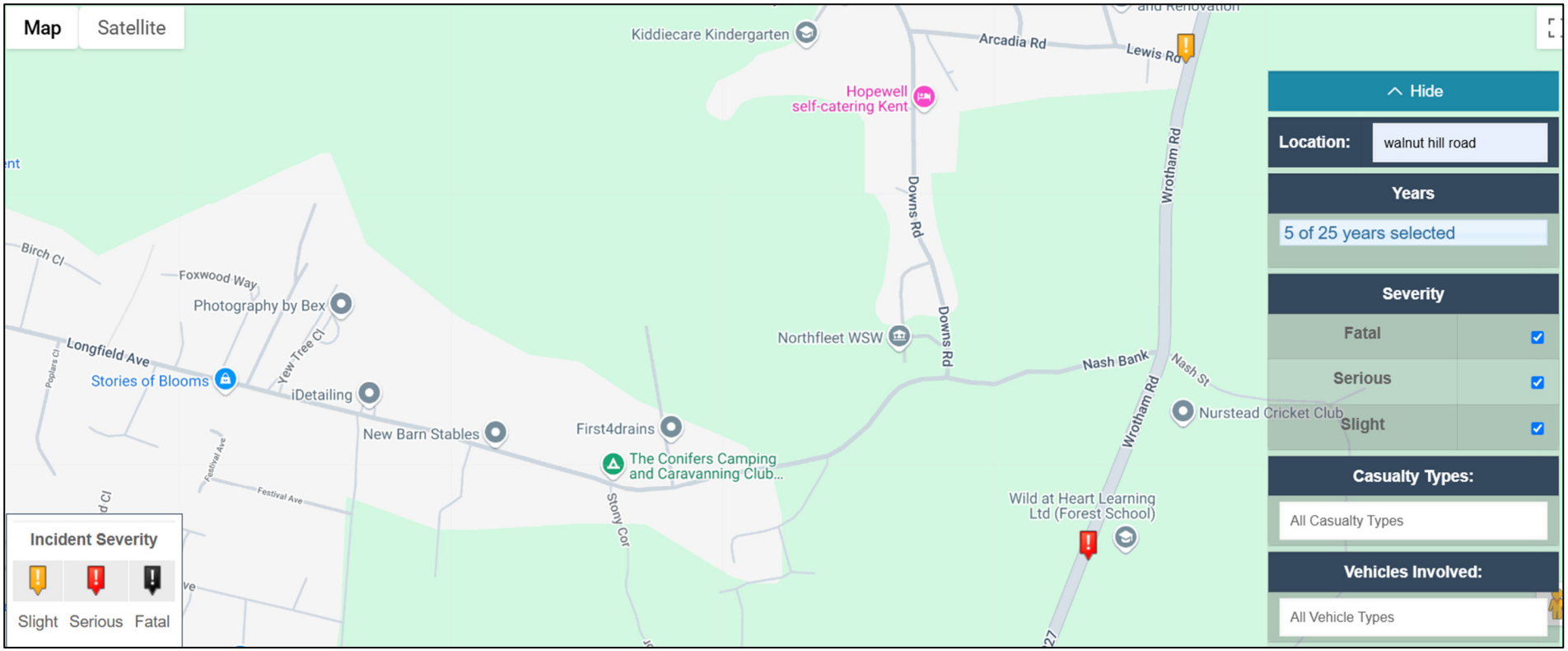
Parameter summary

Trip rate parameter range selected:	2323 - 3700 (units: sqm)
Survey date date range:	01/01/97 - 29/06/24
Number of weekdays (Monday-Friday):	2
Number of Saturdays:	0
Number of Sundays:	0
Surveys automatically removed from selection:	1
Surveys manually removed from selection:	2

This section displays a quick summary of some of the data filtering selections made by the TRICS® user. The trip rate calculation parameter range of all selected surveys is displayed first, followed by the range of minimum and maximum survey dates selected by the user. Then, the total number of selected weekdays and weekend days in the selected set of surveys are show. Finally, the number of survey days that have been manually removed from the selected set outside of the standard filtering procedure are displayed.

Appendix C

PIC Accident Locations and Severity


Map
Satellite
Kiddiecare Kindergarten
Arcadia Rd
Lewis Rd
Hopewell
self-catering Kent
Downs Rd
Wrotham Rd
Hide
Location:
walnut hill road
Years
5 of 25 years selected
Severity
Fatal
Serious
Slight
Casualty Types:
All Casualty Types
Vehicles Involved:
All Vehicle Types
Birch Cl
Foxwood Way
Photography by Bex
Longfield Ave
Yew Tree Cl
Stories of Blooms
iDetailing
New Barn Stables
First4drains
The Conifers Camping
and Caravanning Club...
Northfleet WSW
Nash Bank
Nash St
Nurstead Cricket Club
Wild at Heart Learning
Ltd (Forest School)
Festival Ave
Stony Cor
Incident Severity
Slight
Serious
Fatal

Appendix D

Proposed Site Use TRICS Data

Filtering Summary:

Land Use: 02/A EMPLOYMENT/OFFICE

Selected Trip Rate Calculation Parameter Range: 118 - 3000 sqm GFA

Actual Trip Rate Calculation Parameter Range: N/A sqm GFA

Date Range: Minimum: 1/1/2016 Maximum: 6/27/2024

Parking Spaces Range: All Surveys Selected

Population Within 500m Range: All Surveys Selected

Days of the week selected:

Monday	1
Thursday	1
Tuesday	3
Wednesday	2

Main Location Types selected:

Edge of Town	7

Inclusion of Servicing Vehicles Counts:

Servicing Vehicle Excluded	4
Servicing Vehicles Included	3

Population <1 Mile ranges selected:

1,001 to 5,000	2
10,001 to 15,000	4
15,001 to 20,000	1

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Population <5 Mile ranges selected:

100,001 to 125,000	1
125,001 to 250,000	3
25,001 to 50,000	1
5,001 to 25,000	1
50,001 to 75,000	1

Car Ownership <5 Mile ranges selected:

0.6 to 1.0	6
1.1 to 1.5	1

PTAL Rating:

No PTAL Present	7

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TRIP RATE CALCULATION SELECTION PARAMETERS:

Land Use: 02 - EMPLOYMENT

Category: A - OFFICE

Total Vehicles

Selected regions and areas:

03	**SOUTH WEST**		
	WL	WILTSHIRE	1 day
04	**EAST ANGLIA**		
	NF	NORFOLK	1 day
	SF	SUFFOLK	1 day
05	**EAST MIDLANDS**		
	LN	LINCOLNSHIRE	1 day
06	**WEST MIDLANDS**		
	WK	WARWICKSHIRE	1 day
07	**YORKSHIRE & NORTH LINCOLNSHIRE**		
	AK	WAKEFIELD	1 day
08	**NORTH WEST**		
	EC	CHESHIRE EAST	1 day

This section displays the number of survey days per TRICS® sub-region in the selected set.

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Primary Filtering Selection:

This data displays the chosen trip rate parameter and its selected range. Only sites that fall within the parameter range are included in the trip rate calculation.

Parameter:	GFA
Actual Range:	500 to 3000 (units:sqm)
Range Selected by User:	118 to 3000 (units:sqm)
Parking Spaces Range:	0 - 2923

Public Transport Provision:

Selection by:	All Surveys Included
Date Range:	01/01/16 to 27/06/24

This data displays the range of survey dates selected. Only surveys that were conducted within this date range are included in the trip rate calculation.

Selected survey days:

Monday	1 days
Thursday	1 days
Tuesday	3 days
Wednesday	2 days

This data displays the number of selected surveys by day of the week.

Selected survey types:

Manual count	7
Direction ATC Count	0

This data displays the number of manual classified surveys and the number of unclassified ATC surveys, the total adding up to the overall number of surveys in the selected set. Manual surveys are undertaken using staff, whilst ATC surveys are undertaking using machines

Selected Locations:

Edge of Town	7 days

This data displays the number of surveys per main location category within the selected set. The main location categories consist of Free Standing, Edge of Town, Suburban Area, Neighbourhood Centre, Edge of Town Centre, Town Centre and Not Known.

Selected Location Sub Categories:

Commercial Zone	2 days
Development Zone	1 days
Industrial Zone	3 days
No Sub Category	1 days

This data displays the number of surveys per location sub-category within the selected set. The location sub-categories consist of Commercial Zone, Industrial Zone, Development Zone, Residential Zone, Retail Zone, Built-Up Zone, Village, Out of Town, High Street and No Sub Category.

Inclusion of Servicing Vehicle Counts:

Servicing vehicles Excluded	4 days
Servicing vehicles Included	3 days

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Secondary Filtering Selection:

Use Class:

Not Known	7 surveys

This data displays the number of surveys per Use Class classification within the selected set. The Use Classes Order (England) 2020 has been used for this purpose, which can be found within the Library module of TRICS®.

Population within 500m Range:

0 - 0

Population within 1 mile:

1,001 to 5,000	2 surveys
10,001 to 15,000	4 surveys
15,001 to 20,000	1 surveys

This data displays the number of selected surveys within stated 1-mile radii of population.

Population within 5 miles:

100,001 to 125,000	1 surveys
125,001 to 250,000	3 surveys
25,001 to 50,000	1 surveys
5,001 to 25,000	1 surveys
50,001 to 75,000	1 surveys

This data displays the number of selected surveys within stated 5-mile radii of population.

Car ownership within 5 miles:

0.6 to 1.0	6 surveys
1.1 to 1.5	1 surveys

This data displays the number of selected surveys within stated ranges of average cars owned per residential dwelling, within a radius of 5-miles of selected survey sites.

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Petrol filling station:

This data displays the number of surveys within the selected set that include petrol filling station activity, and the number of surveys that do not.

Travel Plan:

No	7 surveys

This data displays the number of surveys within the selected set that were undertaken at sites with Travel Plans in place, and the number of surveys that were undertaken at sites without Travel Plans.

PTAL Rating:

No PTAL Present	7 surveys

This data displays the number of surveys within the selected set that include petrol filling station activity, and the number of surveys that do not.

COVID-19 Restrictions:

Yes - At least one survey within the selected data set was undertaken at a time of Covid-19 restrictions

This data displays the number of surveys within the selected set that include petrol filling station activity, and the number of surveys that do not.

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1	**AK-02-A-01**	**OFFICES**	**WAKEFIELD**

PIONEER WAY
CASTLEFORD
WHITWOOD
Edge of Town
No Sub Category
Gross floor area: 1230 sqm
Survey date: Tuesday 23/05/2017 Survey Type: Manual

2	**EC-02-A-04**	**OFFICES**	**CHESHIRE EAST**

WINTERTON WAY
MACCLESFIELD
LYME GREEN BUSINESS PK
Edge of Town
Commercial Zone
Gross floor area: 3000 sqm
Survey date: Tuesday 04/05/2021 Survey Type: Manual

3	**LN-02-A-01**	**OFFICES**	**LINCOLNSHIRE**

LINCOLN WAY
LOUTH
FAIRFIELD
Edge of Town
Industrial Zone
Gross floor area: 2114 sqm
Survey date: Monday 29/04/2024 Survey Type: Manual

4	**NF-02-A-04**	**BUILDING CONSULTANT**	**NORFOLK**

WHITING ROAD
NORWICH
Edge of Town
Commercial Zone
Gross floor area: 500 sqm
Survey date: Wednesday 13/11/2019 Survey Type: Manual

5	**SF-02-A-03**	**OFFICES**	**SUFFOLK**

WHITE HOUSE ROAD
IPSWICH
Edge of Town
Industrial Zone
Gross floor area: 2800 sqm
Survey date: Thursday 24/09/2020 Survey Type: Manual

6	**WK-02-A-03**	**ENGINEERING CONSULTANTS**	**WARWICKSHIRE**

BUDBROOKE ROAD
WARWICK
Edge of Town
Industrial Zone
Gross floor area: 796 sqm
Survey date: Wednesday 23/11/2022 Survey Type: Manual

7	**WL-02-A-01**	**PET INSURANCE COMPANY**	**WILTSHIRE**

THE CRESCENT
AMESBURY
SUNRISE WAY
Edge of Town
Development Zone
Gross floor area: 2500 sqm
Survey date: Tuesday 18/09/2018 Survey Type: Manual

DESELECTED SURVEYS

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Site Ref	Survey Date	Reason for Deselection
AN-02-A-06	20-11-2018	Wrong Location
CV-02-A-01	25-10-2022	Wrong Location
LU-02-A-01	09-11-2020	Wrong Location

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TRIP RATE for Land Use 02 - EMPLOYMENT/A - OFFICE

Total Vehicles

Calculation factor: 100 sqm

**BOLD print indicates peak (busiest) period*

Time Range	No. Days	Ave. GFA	Arrivals	Departures	Totals
00:00-01:00					
01:00-02:00					
02:00-03:00					
03:00-04:00					
04:00-05:00					
05:00-06:00					
06:00-07:00					
07:00-08:00	**7**	**1849**	**0.394**	**0.077**	**0.471**
08:00-09:00	**7**	**1849**	**1.213**	**0.185**	**1.398**
09:00-10:00	**7**	**1849**	**1.291**	**0.209**	**1.500**
10:00-11:00	**7**	**1849**	**0.425**	**0.131**	**0.556**
11:00-12:00	**7**	**1849**	**0.147**	**0.193**	**0.340**
12:00-13:00	**7**	**1849**	**0.185**	**0.402**	**0.587**
13:00-14:00	**7**	**1849**	**0.379**	**0.294**	**0.673**
14:00-15:00	**7**	**1849**	**0.317**	**0.263**	**0.580**
15:00-16:00	**7**	**1849**	**0.193**	**0.294**	**0.487**
16:00-17:00	**7**	**1849**	**0.155**	**0.788**	**0.943**
17:00-18:00	**7**	**1849**	**0.062**	**1.437**	**1.499**
18:00-19:00	**6**	**1952**	**0.043**	**0.529**	**0.572**
19:00-20:00					
20:00-21:00					
21:00-22:00					
22:00-23:00					
23:00-00:00					
Total Rates:			**4.804**	**4.802**	**9.606**

This section displays the trip rate results based on the selected set of surveys and the selected count type (shown just above the table). It is split by three main columns, representing arrivals trips, departures trips, and total trips (arrivals plus departures). Within each of these main columns are three sub-columns. These display the number of survey days where count data is included (per time period), the average value of the selected trip rate calculation parameter (per time period), and the trip rate result (per time period). Total trip rates (the sum of the column) are also displayed at the foot of the table.

*To obtain a trip rate, the average (mean) trip rate parameter value (TRP) is first calculated for all selected survey days that have count data available for the stated time period. The average (mean) number of arrivals, departures or totals (whichever applies) is also calculated (COUNT) for all selected survey days that have count data available for the stated time period. Then, the average count is divided by the average trip rate parameter value, and multiplied by the stated calculation factor (shown just above the table and abbreviated here as FACT). So, the method is: COUNT/TRP*FACT. Trip rates are then rounded to 3 decimal places.*

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Parameter Summary:

Trip rate parameter range selected:	118 - 3000 (units: sqm)
Survey date date range:	23/05/2017 - 29/04/2024
Number of weekdays (Monday-Friday):	7
Number of Saturdays:	0
Number of Sundays:	0
Surveys automatically removed from selection:	3
Surveys manually removed from selection:	0

This section displays a quick summary of some of the data filtering selections made by the TRICS® user. The trip rate calculation parameter range of all selected surveys is displayed first, followed by the range of minimum and maximum survey dates selected by the user. Then, the total number of selected weekdays and weekend days in the selected set of surveys are show. Finally, the number of survey days that have been manually removed from the selected set outside of the standard filtering procedure are displayed.

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