



Active  
Travel  
England

Active Travel England  
West Offices  
Station Rise  
York  
YO1 6GA  
Tel: 0300 330 3000

Your Ref: 20251116  
Our Ref: ATE/25/01756/OUT  
Date: 12 December 2025

## 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:** 20251116

**Site Address:** Land West Of Norwood Lane Meopham Gravesend, Kent,  
DA13 0YE

**Description of development:** Outline application with all matters reserved (except access) for a development of up to 150 dwellings (Use Class C3), including affordable dwellings, and associated landscaping, public open space and infrastructure works.

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 development, an outline planning application with all matters reserved except for access, east of Norwood Lane in Meopham, Kent.

### Trip generation, assignment and mode shares

The applicant should be providing forecasts for all modes (including active travel modes) throughout the day. The current approach only focuses on peak times, which is likely to miss a lot of journeys throughout the rest of the day, and overrepresents commuting journeys.

ATE is satisfied with the walking audit but requests that recommendations be additionally provided to improve cyclist safety. The identification of specific interventions is welcomed.

ATE believes the travel plan targets are pessimistic, with only 20% of trips walked and 2% cycled by year 5. This falls far below the government target of 50% of journeys taken by AT modes, which ATE believes should apply to this site due to the surrounding shops, schools and public transport. Cycling (as well as bus/train) modal share remains particularly low. Whilst the proposed cycle discounts is welcomed, ATE encourages 'hard' infrastructure interventions as being key to utility cycling uptake, and notes that none of the

proposed physical measures do anything to improve cycle routes. ATE supports the actions to be taken if the targets are not met, but would like to remind the applicant that infrastructural changes to sustainable travel are much harder to implement retrospectively. As such, this should be a priority at this stage to avoid this situation.

### **Pedestrian access**

Due to the likely pedestrian flows towards Camer Parade and Meopham Primary school (750m), ATE would like more information whether the crossings at the site frontage are considered appropriate and accessible for the traffic numbers and speeds. ATE considers 800m to be the maximum recommended walking distance as per the National Design Guide (2021) and considers the 2km figure from MfS to be outdated. 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.

ATE supports the applicant's interventions as outlined in the route audit, but asks whether more can be done to improve walking safety to Meopham Station (1.2km). If improvements are to be made, it would be worth consulting with the LHA whether a route via Denesway or Norwood Lane is favoured. Meopham Secondary School is located 1.8km away from the site; as such a walking route should be available which meets the above criteria.

### **Cycling accessibility**

ATE would request that the applicant consider whether more can be done to improve cycle connections, particularly to Meopham Station, Camer Parade and the schools. Cycling on Norwood Lane is not ideal as the road is narrow with poor visibility and is unlit. ATE recognises the low traffic flow on this road, but does not believe this represents an appropriate route in the long term considering the land allocation for housing to the east of Norwood Lane in the draft local plan. Regardless, ATE is unlikely to support a cycle route at this location if it remains unlit. Cycle provision to connect the site to the Camer Parade corridor and the proposed Richborough development (east of Wrotham Road) would be welcomed also. Despite the 30mph speed limit, Green Lane remains hostile to all but the most confident cyclists, and ATE is unlikely to support any proposal which forces cyclists to mix with traffic in this location without interventions.

### **Access to public transport**

The site is slightly further than is optimal for public transport. It is 1.2km from Meopham station and 300m to the nearest bus stop from the edge of the site at Tradescant Drive. This makes AT connectivity to access public transport even more important. Bus stops should include: a shelter, seating and real time information displays as per LTN 1/24. ATE requests that the LPA take a holistic view regarding developments in the Meopham area, and ask for proportionate contributions towards public transport (bus and rail)

### **Masterplanning and permeability**

ATE strongly recommends the applicant discuss off site improvements with Richborough, who have proposed a development to the south of Green Lane opposite Camer Parade, as the Green Lane/Wrotham Road junction currently has two conflicting design proposals. This should also be discussed and agreed with the LHA. ATE suggests that some form of crossing accessible to all users and appropriate for the vehicle speeds and volumes is provided at the site entrance, for example a priority side road treatment or tactile paving.

Any additional improvements should be agreed with the LHA<sub>1</sub> including considering the Gravesham LCWIP route 6 which runs close to the site.

ATE requests details regarding the proposed pedestrian access to Camer Park, and asks whether the site access could be put directly across from the park entrance to reduce the distance pedestrians need to walk alongside Green Lane and thereby facilitate what will be a natural desire line. Consideration should be given to whether a pedestrian crossing is appropriate. Additionally, ATE seeks clarification on the extent of the southern footway on Green Lane and whether this extends all the way to the Camer Park entrance. ATE supports the remaining proposed access points for pedestrians and cyclists, and requests all outlined site access points be safeguarded and committed to at this stage, including the emergency vehicle access. Additionally, ATE would like to see a commitment that all proposed paths are accessible and made of a smooth, sealed surface. ATE expects all proposals to adhere to inclusive design guidance and LTN 1/20. Whilst this is an outline application, ATE expects the applicant to fully consider pedestrian and cyclist access, permeability and surveillance for the RM application.

ATE supports the decision for a 20mph site speed limit, and expects the street design to reflect this at RM stage.

### **On-site facilities**

ATE recognises that the applicant plans to provide cycle parking in line with KCC's recommendations of 1 secure space per bedroom. ATE would like to remind the applicant that all residential cycle parking should be secure and located within the building or garage footprint. The use of gardens or sheds will not be supported as these are not considered secure or convenient. Cycle parking should additionally have direct access to the highway (as opposed to needing to be taken through homes) to make it as easy as possible to choose cycling as transport. ATE requests this be committed to and secured by a relevant condition at this stage. ATE would like to see a contribution towards secure cycle parking at Meopham station, and suggests this could form a proportionate contribution alongside other developments.

### **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 deficits, with a view to providing a further response and recommended wording for planning conditions and obligations.