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Your Ref: 20260207
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Date: 20/03/2026

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

From: Spatial Planning Service, Active Travel England

To: *Gravesham Planning Team - Gravesham Borough Council*

Application Ref: 20260207

Site Address: **LAND NORTH OF, CAMER ROAD, MEOPHAM, GRAVESEND,
DA13 0YE**

Description of development: *Outline planning application for up to 725 dwellings (Use Class C3), a new two-form entry primary school (Use Class F1), a Local Centre (up to 500sqm of Class E floorspace), the provision of Public Open Space including sport and recreation facilities alongside associated access, landscaping, parking, and infrastructure; with all matters reserved except for access.*

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

ATE is pleased for the opportunity to comment on this application, an outline application for up to 725 dwellings, a new two-form entry primary school, a Local Centre, public open space, recreation facilities, landscaping, parking and infrastructure with all matters reserved except for access.

The Site is allocated in the Emerging Gravesham Local Plan Regulation 18 (2020) alongside several other nearby site allocations which already have pending planning applications. ATE considers it critical that all applicants communicate and work together to make sure the proposed developments form a cohesive active travel network.

National policy context

ATE considers that development should demonstrate adherence to the following policies:

NPPF 109, 110, 111, 115, 117 and 118.

Gravesham Local Plan relevant policies:

5.5.41: "The Council will seek improvements to walking and cycling facilities and networks in the Borough including provision in new development as appropriate. These should provide improved access to Gravesend Town Centre and Ebbsfleet and to other services and facilities in the Borough."

5.7.22: " A multifunctional linked network of green spaces, footpaths, cycle routes and wildlife stepping stones and corridors will be created, protected, enhanced and maintained. The network will improve access within the urban area, from the urban area to the rural area and along the River Thames."

Policy CS19: Development and design principles

Trip assignment and mode shares

The provided trip generation only includes journeys taken in the AM and PM peaks, and an overall total. ATE expects to see this broken down by hour across the day to provide a better understanding of when these journeys are taking place. This is particularly important for the school, as a 17:00-18:00 PM peak reading is not relevant for this use as typical school finish times generally fall before this. Furthermore, whilst it is welcomed that trip generation has been provided for various journey types, including shopping, sports pitches etc, only measuring these during the peak hours does not provide useful data as to the journeys taken to these amenities.

Whilst ATE considers the active travel route audit is detailed, it does not outline proportionate action to be taken to improve the walking and cycling environment.

ATE considers these should be funded through proportionate S106 contributions instead of relying on the LHA. Consideration should also be given to the LCWIP.

ATE considers the travel plan targets to be unambitious considering the site location and context. A 10% decrease in private car use still represents a proposed mode share of 58%. ATE considers this to be too high, and the corresponding 5% and 2% of journeys taken by walking and cycling are extremely disappointing. This appears to contradict the TA which suggests people would be willing to walk up to 2km to access amenities in Meopham, indicating that this is likely unrealistic and that it is more likely that people are driving instead. This cements the critical importance of providing as much as possible on site as part of the local centre, as it demonstrates that the current proposals are likely to be unsustainable. Furthermore, the proposed increase of bus journeys still sits at only 7%, indicating that more needs to be done to make the bus a viable method of transport. ATE supports the proposed travel plan measures, but notes the promotional measures are unlikely to significantly alter modal share. Measures such as free bus travel are welcomed.

Walking

The site has a primary school and local centre on site, which will be accessible to all residences within a reasonable walking distance (approximately a 10 minute walk.) A majority of primary school journeys should be able to be completed on foot, including from the neighbouring site on Norwood Lane. This is welcome.

The nearest secondary school is around 2.8km away which is too far to be reasonably walkable. The nearest shops are on Wrotham Road near Meopham Station, a walking distance of around 1km, and other shops at Camer Parade are around 1.5km walking distance away. ATE recommends that the maximum walking distance be no more than 800m or a 10-15 minute walk as outlined in the National Design Guide (2021.) Since many amenities including those listed above are further from the site than this, it is recommended that the applicant consider whether any of these amenities can be provided as part of the local centre. ATE would like to reiterate that if the distance to key amenities is greater than 800m it is even more important that the route is of high quality. In any case the route should be accessible to all users with:

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

ATE would like to remind the applicant that the above standards include PRowS. This should be agreed with KCC's PRow department ATE disagrees with the assessment that people are willing to walk up to 2km to access these services. For households with access to a car, the likelihood of it being used for a short journey increases with distance, especially if the alternative walking or cycling routes are not high quality, and if the destination has free parking. ATE requests Norwood Lane be provided with street lighting. All routes identified on the masterplan should be lit, a lighting plan would be useful here. ATE recognises that the significant and disjointed development in the Meopham area makes implementation of these measures a joint goal between the applicants. ATE recommends that this be discussed with the applicants for nearby sites to avoid any gaps in provision, or contradictory drawings.

ATE notes that the vehicle modelling indicates there are likely to be 7000-8000 vehicle movements per day to the north of the site on Camer Road in the forecasted traffic figures. This puts the safety of the current Sole Street station access arrangement in jeopardy without a controlled crossing. ATE is not willing to support this station access arrangement, and requests the applicant find a way to provide traffic-free access to Sole Street station through the site.

ATE requests that the access drawings be updated to clearly indicate footways adjacent to the road, and notes that a continuous route should be provided connecting the site to Meopham via Camer Road/Green Lane. This is particularly important to fill the missing link in footway provision between Norwood Lane and Camer Park Road. A link here must be provided as there is no guarantee the adjacent development will come forward, and ATE cannot allow this to create gaps in the network.

Cycling

Given the size of this development, ATE considers contributions should be made to fund Gravesham LCWIP 6. It is unclear to ATE which route is preferred by GBC at this stage, but it would be expected for the applicant to agree this with GBC as soon as possible. ATE believes that the alternative option is favourable at this location due to being separated from traffic (although maintains the belief that each section should be decided individually.) If this is done, the railway footbridge should be upgraded to allow the use by cyclists and wheelchairs. Wrotham Road is unsuitable for cycling. ATE considers Traffic speeds, volumes and HGV volumes to be far too high to consider on-carriageway cycling acceptable here. ATE strongly encourages the applicant to work with other developers in the area to create a safe and coherent cycle route along this corridor between Meopham station and Camer Parade/Meopham Secondary School. ATE reminds the applicant that shared use facilities are not recommended as per LTN 1/20. ATE supports the proposals for Norwood Lane in principle, but raises concerns for safety with the route not being lit or overlooked which should be addressed. Removing through traffic will greatly improve pedestrian and cyclist safety between the Site and the existing settlements at Meopham, but it may be advantageous to route these journeys through the site roads.

Public Transport

Without a direct connection to Meopham Station, the walking distance from the site access via Norwood Lane is around 750m. As such, most residential parcels exceed 800m from Meopham. If a more northerly route could be provided via the Railway Sidings and station car park this could be dramatically reduced, and ATE suggests the applicant investigate ways this could be provided. Sole Street station is closer and has better potential for good quality active travel connections. ATE strongly believes a direct paved path should be provided connecting to Sole Street station to avoid Camer Road. The current plans for a recreational path do not meet the standards, and the route via Camer Road is both longer, less direct and less safe. ATE considers direct train station access to be critical in justifying the sustainability of this site, and considers the current proposed route which requires crossing Camer Road twice to be unacceptable, and contrary to LTN 1/20 guidance.

ATE would welcome talks with Southeastern to identify whether additional or faster services can be provided (especially in the peak) from Sole Street and/or Meopham. The scale of development in the Meopham area brings into question the need for a more frequent rail service, especially from Sole Street which currently sees one stopping train per hour in each direction to London Victoria (58mins) and Gillingham (17mins.) Express services call at Meopham only in the off-peak to provide a 35-minute journey time to London. Journeys between Meopham/Sole Street and Gravesend are possible by train in approximately 30 minutes (change at Rochester), but this is an expensive and infrequent option, although ATE notes that this option is available much later into the evening compared to the existing bus service. ATE considers that a fast and frequent service is

important to encourage more journeys by rail, but also to incentivise walking or cycling to a local station rather than driving to Gravesend or Ebbsfleet to pick up a Southeastern High Speed service to London St Pancras. Whilst ATE recognises that Sole Street and Meopham stations are located close to the site, the lack of step free access at both stations when travelling away from London (towards Medway and the Kent Coast) also presents a significant area of concern here. Due to the significant development expected in the Meopham area, ATE expects this to be discussed with Southeastern Railway in order to identify if a solution is possible. This is likely to be a major scheme so should be undertaken with the applicants of the neighbouring proposed sites.

ATE supports the proposals to include a new bus stop in the centre of the site, however the service must be dramatically improved to make this development sustainable. The TA outlines the current preferred option is to divert the existing 416 route. ATE has a concern regarding the usefulness of this route, as it currently operates 3-4 times per day on weekdays, with no Sunday service. It is accepted that the 416 provides links to Shorne, however the journey time from Meopham to Gravesend is 36mins vs 23 on the more direct 308. Diversion of this route will lengthen journey time further. A 30 minute bus journey to Gravesend is likely to be of limited attractiveness to anyone with access to a car. ATE considers more needs to be done to make public transport more attractive for journeys to Gravesend. As the nearest large town, it can be expected that a large number of trips will be generated between Meopham and Gravesend. ATE supports the proposed KCC Public Transport Note which suggests improvements to the 308 bus to increase the frequency to half-hourly from 06:00-23:00 on Monday-Saturday and 09:00-17:00 on Sundays. The funding has been estimated by KCC as around £660,000 per year (not including any school bus uplift)

Masterplanning and permeability

ATE supports the proposed street sections and raised tables at junctions to reinforce pedestrian priority, and expects these to be brought forward to reserved matters. ATE urges the applicant to do as much as possible to provide a pedestrian/cycle link between the site (near the pump station) and Meopham railway Station via the Railway Sidings and the station car park to provide a more direct option for residents in the northern area of the site compared with using Norwood Lane. Discussions should be made with the developer proposing the scheme to the west of Norwood Lane to ensure connections are consistent and provide a continuous and high quality link both between sites and further into Meopham. ATE expects all paths which are likely to be used to travel within or out of the site to be paved and with appropriate lighting. Recreational routes should not be used to provide connections between locations, but may be acceptable to provide a more scenic route when other more direct options are available. ATE requests the applicant consider foot connections along Camer Road, especially towards Camer Park and Meopham. Plans should be able to stand on their own if the neighbouring application does not go forward, so this site should not be relied upon to provide the missing link. A footway should be provided along the entire length of Camer Road to ensure pedestrians from the southern parcels can get towards Meopham easily. ATE is not satisfied with the provided drawings. These should be updated to clearly include footway provision including widths.

ATE is concerned with several of the routes, most notably Norwood Lane which will not be overlooked. This presents safety concerns. ATE supports the proposed 20mph speed limit throughout. This will be aided with the use of raised tables which should be brought

forward to RM stage. All relevant infrastructure within the development should conform to LTN 1/20 and the National Model Design Code. Seating should be provided at regular intervals.

Cycle parking

ATE notes that the development will conform to KCC cycle parking guidance, and that this is in line with LTN 1/20 in terms of providing one cycle space per bedroom. Whilst the exact details of this are expected to be confirmed at RM stage. Cycle parking should be considered at the earliest possible stage of a scheme design or building development (LTN 1/20 11.1.4). ATE would like to remind the applicant that LTN 1/20 stipulates that cycle parking should be convenient (11.2.5), should provide "dedicated ground floor cycle storage" (11.8.1). ATE does not consider gardens or sheds to be appropriate cycle storage for a new development, which is supported by LTN 1.20 11.8.2 which outlines security concerns. Garden cycle parking has critical security issues, inviting theft and weather damage. ATE also considers this to be inappropriate as it introduces barriers to cycle use, reducing convenience and encouraging car trips. Finally, cycles risk competing for space in sheds with gardening equipment, barbeques etc. Cycle storage should be provided within the building footprint with as easy access to the highway as possible.

ATE suggests discussions are had with Southeastern regarding increasing the cycle parking provision at Meopham Station, this should be undertaken alongside applicants for the other proposed developments in Meopham.

Next steps

ATE requests this advice be shared with the LPA case officer, agent and applicant. ATE would be happy to discuss this in more detail if required, and review this decision if changes are made.