



National Highways Planning Response (NHPR 25-01) Formal Recommendation to an Application for Planning Permission

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To: Gravesham Borough Council (FAO Adeoye Lawal)
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CC: transportplanning@dft.gov.uk
spatialplanning@nationalhighways.co.uk

Council's Reference: 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 154 No. residential dwellings (including affordable housing), with all matters reserved except for access. Creation of a new access from Downs Road.

National Highways Ref: NH/26/14373

Referring to the consultation on a planning application dated 5 January 2026 referenced above, in the vicinity of the A2 that forms part of the Strategic Road Network, notice is hereby given that National Highways formal recommendation is that we:

- ~~a) offer no objection (see reasons at Annex A);~~
- ~~b) recommend that conditions should be attached to any planning permission that may be granted (see Annex A – National Highways recommended Planning Conditions & reasons);~~
- c) recommend that planning permission not be granted for a specified period (see reasons at Annex A);**
- ~~d) recommend that the application be refused (see reasons at Annex A)~~

Highways Act 1980 Section 175B is not relevant to this application.¹

This represents National Highways' formal recommendation and is copied to the Department for Transport as per the terms of our Licence.

Should the Local Planning Authority propose not to determine the application in accordance with this recommendation they are required to consult the Secretary of State for Transport, as set out in the [Town and Country Planning \(Development Affecting Trunk Roads\) Direction 2018](#), via transportplanning@dft.gov.uk and may not determine the application until the consultation process is complete.

The Local Planning Authority must also copy any consultation under the 2018 Direction to PlanningSE@nationalhighways.co.uk.

This response and all comments outlined herein are made in respect of planning matters only in National Highways' position as a statutory planning consultee, and does not confer any proprietary rights nor amount to the giving or refusal of consent, assent, approval, or awareness of or by National Highways in or of any other aspects or matters (including, but not limited to, the use of property belonging to National Highways). If anyone wishes for National Highways to consider any aspects which do not relate to planning submissions, they should call our contact centre on 0300 123 5000.

Signature:		Date: 17 April 2026				
<table style="width: 100%; border-collapse: collapse;"><tr><td style="width: 50%;">Name: Bidur Rajbhandari</td><td style="width: 50%;">Position: Assistant Spatial Planner</td></tr><tr><td colspan="2" style="padding-top: 10px;">National Highways Ground Floor, Building 1000, Cathedral Square, Guildford GU2 7YL www.nationalhighways.co.uk</td></tr></table>			Name: Bidur Rajbhandari	Position: Assistant Spatial Planner	National Highways Ground Floor, Building 1000, Cathedral Square, Guildford GU2 7YL www.nationalhighways.co.uk	
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Annex A National Highways' assessment of the proposed development

National Highways has been appointed by the Secretary of State for Transport as a strategic highway company under the provisions of the Infrastructure Act 2015 and is the highway authority, traffic authority and street authority for the Strategic Road Network (SRN). The SRN is a critical national asset and as such we work to ensure that it operates and is managed in the public interest, both in respect of current

¹ Where relevant, further information will be provided within Annex A.

activities and needs as well as in providing effective stewardship of its long-term operation and integrity.

Recommend that planning permission not be granted for a specified period:

It is recommended that the application should not be determined for a period of three months until **17 July 2026** to address our comments below.

National Highways had been consulted by the applicant during pre-application stage with a Transport Scoping Note prepared by DHA dated May 2025. NH had made the following comments:

- *Collision analysis to be undertaken at A27 / A227 Wrotham Road junction*
- *Details to be provided of the measures which are proposed to achieve the aims of the vision*
- *Junction assessment to be undertaken at A2 / A227 Wrotham Road junction*
- *Junctions 2025 base model to be calibrated against the highest 15-minute average queue on each arm in each assessment period using direct intercept adjustment*
- *Assessment to be undertaken at year 2028, any TEMPro alternative assumptions to be clearly documented, the LPA should be consulted on committed development for inclusion in assessment and provided to National Highways for review*
- *Assessment to be undertaken both without and with the committed highway mitigation scheme*

National Highways was consulted by GBC on 5 January 2026 and requested to review a Transport Assessment (TA) and an Interim Travel Plan (ITP) both prepared by DHA and dated November 2025.

NH undertook review of the submitted TA and ITP and had the following comments:

- Collision analysis to be undertaken at A27 / A227 Wrotham Road junction
- Committed development assumptions to be clarified with the LPA
- Traffic flow diagrams to be provided
- Junction assessment to be revised

We have reviewed Transport Technical Note (TTN) prepared by DHA and dated March 2026 and our comments are provided below.

This recommendation can be replaced, renewed, or reviewed during the three-month period, or at its end, dependent on progress made with regards to the outstanding matters.

Reasons

Throughout this response **ACTION points** for the applicant are highlighted in **underlined bold**.

Traffic Flow Diagrams

We previously noted that the 2023 Base traffic flows consistent with the Former Tollgate Hotel planning application should be provided, ensuring alignment with the model inputs. The 2023 Base traffic flows are confirmed to be contained within Appendix D of the TTN, with the remaining traffic flow diagrams being contained within Appendix P of the TA.

The A2 eastbound off-flow traffic flows should be reviewed, currently the 2030 Do Nothing flow is higher than the 2030 Do Minimum flow.

Junction Assessment

The TTN contains updated junction assessment at the A2 / A227 Wrotham Road junction, comprising the north and south dumbbell roundabouts.

A227 Wrotham Road / A2 Eastbound off-slip Roundabout

The submitted Junctions 11 input files have been reviewed and are confirmed to align with the Junctions 11 PDFs contained within Appendix D of the TTN.

The geometry provided within the submitted Junctions 11 models has been reviewed and we note the following:

- Former Tollgate Hotel Site Access – we previously noted that the assessment had been undertaken based on the proposed site access associated with planning application 20240856, this has now been revised to reflect the existing geometry and is confirmed to be acceptable

The demand sets within the Junctions models have been reviewed and we note the following:

- 2023 Base traffic flows consistent with the Former Tollgate Hotel 2023 MCC have been included within the models as previously requested

We previously noted that base models are required to be calibrated against the highest 15-minute average queue on each arm in each assessment period. The AM and PM models are confirmed to include 'direct intercept' adjustment to ensure acceptable calibration for both peak periods.

The model results will be reviewed once the traffic flows are clarified, currently the results show A2 eastbound off-slip performs better with 2030 Do Minimum than with 2030 Do Nothing.

A227 Wrotham Road / A2 Westbound off-slip Roundabout

The submitted Junctions 11 input files have been reviewed and are confirmed to align with the Junctions 11 PDFs contained within Appendix D of the TTN.

The geometry provided within the Junctions models has been reviewed and we note the following:

- A20 westbound off-slip – the approach road half-width has been revised from 5m to 3.7m as previously requested

The demand sets within the Junctions models have been reviewed and we note the following:

- 2023 Base traffic flows consistent with the Former Tollgate Hotel 2023 MCC have been included within the models as previously requested
- **2030 Do Nothing PM traffic flows on arm 1 (A20 westbound off-slip) do not align with Figure 13 contained within TA Appendix P**

We previously noted that base models are required to be calibrated against the highest 15-minute average queue on each arm in each assessment period. The AM and PM models are confirmed to include 'direct intercept' adjustment to ensure acceptable calibration for both peak periods.

The results demonstrate significant impact on the A2 westbound off-slip as a result of the proposed development, with the 2030 AM queue increasing from 194 passenger car units (PCU) to 202 PCU because of the proposed development. **As the development causes an increase in stationary traffic on the A2 mainline this is a significant safety concern which is required to be addressed.**

A227 Wrotham Road / A2 Westbound off-slip Roundabout Interim Mitigation

We note that the Former Tollgate Hotel planning application (reference 20240856) contains an interim mitigation scheme at this junction, as shown on approved drawing ref: 22052-MA-XX-DR C-0102 P07 and referred to within the decision notice. **We note that this scheme has not been assessed, therefore assessment of this mitigation should be included to determine if this is sufficient to address the impacts of the current planning application.**

We note Former Tollgate Hotel utilised lane simulation within the Junctions model, thereby allowing the impact of revision in lanes to be determined.

A227 Wrotham Road / A2 Westbound off-slip Roundabout Final Mitigation

We acknowledge the updated LinSig assessment of the final mitigation scheme has been submitted and we note the following:

- We previously noted that the proposed pedestrian crossing should be included within the traffic signal phasing, this has not been included

The traffic flows and scenarios within the submitted LinSig model have been reviewed and we note the following:

- The naming of the six traffic flow matrices has been revised as requested
- 2030 Do Minimum PM – A227 Wrotham Road (south) left-turn traffic flow has been omitted
- The traffic flow matrices have been assigned to scenarios as requested

The results within the submitted LinSig model have been reviewed and we note that:

- The submitted LinSig model contain results which align with the TA

The LinSig modelling results currently demonstrate the proposed final mitigation operates satisfactorily with no significant impact on the SRN as a result of the proposed development. While we have noted a number of matters above, in our view the omission of the pedestrian crossing and the traffic flow issues would not materially affect the results. It is therefore not necessary for any additional refinement associated with the modelling of the final mitigation scheme.

Construction Traffic Management Plan

At the appropriate stage of the planning process, National Highways will recommend a suitable planning condition in relation to the preparation, agreement, and adherence to a Construction Traffic Management Plan (CTMP).

Standing advice to the local planning authority

The Climate Change Committee's [2022 Report to Parliament](#) notes that for the UK to achieve net zero carbon status by 2050, action is needed to support a modal shift away from car travel. The NPPF supports this position, with paragraphs 77 and 110 prescribing that significant development should offer a genuine choice of transport modes, while paragraphs 109 to 116 etc advise that appropriate opportunities to promote walking, cycling and public transport should be taken up as part of a vision-led approach.

Moreover, the carbon reduction hierarchy (avoid-switch-improve) as set out in clause 4.3 of PAS2080:2023 promotes approaches and measures to minimise resource consumption and thereby reduce carbon emissions.

These considerations should be weighed alongside any relevant Local Plan policies to ensure that planning decisions are in line with the necessary transition to net zero carbon.