



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

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CC: transportplanning@dft.gov.uk
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Council's Reference: 25/503683/OUT

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: 19 January 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 **19 April 2026**.

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*

We have reviewed the submitted TA and ITP and note that not all there are still issues that need to be addressed as listed 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**.

Transport Assessment Review

Collision Analysis

We previously noted there is a requirement for collision analysis to be undertaken at the A2 / A227 Wrotham Road junction, including the slip lanes. The TA has been

reviewed, **this collision analysis is not included and is therefore required to be provided; this is required for the latest 5-year period for which data is available.'**

Committed Development

We previously noted that the LPA should be contacted to seek advice on the committed development to include within the assessment and this should be provided to National Highways for review.

The TA notes that committed development assumptions at the SRN have been made consistent with planning application 20240856. However, it is possible that the committed developments have now changed. **The LPA is required to be consulted with regard to committed development assumptions, correspondence with the LPA should be provided for review. We also require the committed development to be shown on traffic flow diagrams, in a manner where we can follow.**

If the LPA confirms the committed development can remain as adopted for planning application 20240856 then we would only require this total committed development to be shown; if the committed development assumptions require to be modified, then we would require to see each committed development shown separately.

Traffic Flow Diagrams

The generated traffic shown in Figures 2 and 3 of Appendix M of the TA has been reviewed and is confirmed to align with the presented trip distribution/assignment.

The National Highways email dated 1 July 2025 to the applicant previously agreed that reference may be made to the publicly available 2023 manual classified count (MCC) data collected in association with planning application 20240856 (Former Tollgate Hotel). **This MCC data is not provided within the TA and should be provided in traffic flow diagram form, it is not necessary to provide the raw data, however the specific source report should be referenced.**

The TA does not contain traffic flow diagrams showing the assessment year base traffic flows or total traffic flows and these should be provided, ensuring alignment with the model inputs.

Junction Assessment

As previously requested, the TA contains assessment at the A2 / A227 Wrotham Road junction, comprising the north and south dumbbell roundabouts.

A227 Wrotham Road / A2 Eastbound off-slip Roundabout

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

- **Former Tollgate Hotel Site Access – we acknowledge for this arm the geometry which is shown is the proposed site access associated with**

planning application 20240856 – this application is currently ‘pending consideration’, therefore the development is not committed and the modelling should be undertaken based on the existing geometry

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

- Traffic flow profile is ‘one hour’ – we confirm this is acceptable
- **2025 Base is provided however there is no 2023 Base, this is required to be provided if the intention is to reference the Former Tollgate Hotel 2023 MCC as previously requested by DHA**
- Future year demand sets are stated to be 2030 Do Nothing and 2025 Do Minimum (we assume this is meant to be 2030 Do Minimum), as noted above we have no objection to future year assessment at 2030 rather than 2028 as previously advised
- 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 ‘direct intercept’ should be adjusted to ensure acceptable calibration for both AM and PM peak periods, either with separate AM and PM models or with separate AM and PM analysis sets within one model.
- **The calibration within the model has been reviewed, it is seen that there is one arm which has a ‘percentage capacity’ adjustment, while the remaining arms have no calibration. The percentage capacity adjustment is not accepted, and all calibration should be undertaken using direct intercept as advised previously.**
- The National Highways email of 1 July 2025 highlights concerns with regard to the Former Tollgate Hotel queue data and provides details of the subsequent calibration approach adopted. ***We acknowledge that calibration has been undertaken for the AM peak, however the 60 passenger car units (PCU) on A20 westbound off-slip is required to be reflected during both the AM and PM peaks.***

A227 Wrotham Road / A2 Westbound off-slip Roundabout

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

- **A20 westbound off-slip – the approach road half-width should be revised from 5m to 3.7m, otherwise the geometry confirmed to be acceptable**
- A227 (south) – geometry confirmed to be acceptable
- A227 (north) – geometry confirmed to be acceptable

With regard to demand sets and calibration, the comments are the same as provided above for the north roundabout.

A227 Wrotham Road / A2 Westbound off-slip Roundabout Mitigation

We previously advised that junction assessment should also be undertaken with the committed mitigation scheme and this has been provided. The network provided within the submitted LinSig model has been reviewed and we note the following:

Proposed pedestrian crossing should be included within the traffic signal phasing

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 is unclear as the base is stated to be 2030 and the do nothing and do minimum scenarios do not have a year**
- **Traffic flow diagrams should be provided which align with the LinSig model inputs**
- **The traffic flow matrices are required to be assigned to scenarios, currently the six matrices are unassigned**

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

- **The submitted LinSig model does not contain results which align with the TA, there is a need to provide scenarios which align with the traffic flows**

The LinSig modelling should be updated and the resubmitted, together with the soft copy LinSig input file, for review.

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.