



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

From: Hermes Luli (Head of Planning & Development)
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To: Gravesham Borough Council (FAO Ms Amanda Cue)
planning.reps@gravesham.gov.uk

CC: transportplanning@dft.gov.uk
spatialplanning@nationalhighways.co.uk

Council's Reference: 20260815

Location: Woodlands Farm , Wrotham Road, Culverstone, Gravesend Kent

Proposal: Outline planning application for the development of 67 dwellings, public open space and associated works, with approval sought for the principal means of vehicular access from Newlands Lane. All other matters are reserved.

National Highways Ref: NH/26/17629

Referring to the consultation on a planning application dated 10 August 2026 referenced above, in the vicinity of the M20, M26 and 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: 02 September 2026

Name: Bidur Rajbhandari

Position: Assistant Spatial Planner

National Highways

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

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

Recommendation: No Objection

We have reviewed the application submissions. We note that:

- National Highways role is to consider the impacts on the SRN and any need for mitigation. All local road matters (including active & sustainable transport matters) will be dealt with by Kent County Highways, and all non-highway related matters by other statutory consultees.
- A Transport Statement has been produced by RSPD dated July 2026 has been reviewed. This showed that the proposed development could generate 11 arrivals and 39 departures in the AM peak time, and 38 arrivals and 21 departures in the PM peak.
- Though the TA does not show the resulting trip generated on the SRN, the trip generate by the proposed development will be distributed to A2, M20 and M26 junctions and we agree in principle that the resulting impact on SRN will not be severe given the location and scale of the development.
- It is for the LPA to assess and agree with the TS as any potential impact would be on the local road network.
- The site is located circa 4km from the nearest parts of the Strategic Road Network.

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 2026 supports this position, with Chapter 15 prescribing that significant development should offer a genuine choice of transport modes and 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.