



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: 26 May 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

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.

Background

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 had the following comments:

- *A2 eastbound and A2 westbound off-slip traffic flows to be reviewed*
- *A2 westbound significant safety concern is required to be addressed*
- *A227 Wrotham Road / A2 Westbound off-slip roundabout interim mitigation scheme is required to be assessed*
- *Junction assessment to be revised*

Following this DHA provided revised Junctions files for the purpose of addressing minor errors in the modelling and had the following comments:

- *Traffic flows diagrams to be provided in order to verify A2 eastbound off-slip flows*
- *Junctions assessment demonstrates the need for mitigation at the A2 westbound off-slip roundabout*

Following this we have been consulted by DHA on 7 May 2026 and requested to review a Transport Technical Note (TTN) prepared by DHA and dated May 2025. We have reviewed this and come to the following conclusion.

Recommendation: conditions should be attached to any planning permission that may be granted.

Conditions

A227 Wrotham Road/A2 Roundabout (westbound off-slip) Mitigation

Prior to the occupation of the development hereby permitted, the improvement scheme identified for the A227 Wrotham Road/A2 Roundabout (westbound off-slip) as shown in approved drawing ref: 22052-MA-XX-DR-C-0102 P07 in the Former Tollgate Hotel Stage 1 Road Safety Audit Response Report (29 August 2025), shall be completed and open to traffic.

Reason:

The forecast queuing at this junction is within the capacity of the off-slip and an improvement on the scenario without development with the existing layout. It is concluded the interim mitigation scheme ensures that the impact of the proposed development is acceptable and does not result in a significant impact on the SRN.

This will mitigate the impact of the development on the A2, in accordance with paragraph 116 of the NPPF (December 2024) and paragraph 40 of the DfT Circular 01/2022.

We note that paragraph 1.2.15 of the TTN acknowledges that a suitable planning condition should be provided requiring the interim mitigation scheme, consistent with Condition 26 of the recently approved Former Tollgate Hotel application.

Pre-Commencement condition

Construction Traffic Management Plan

No works shall commence on the site hereby permitted (including site clearance or preparation) until the details of a Construction Traffic Management Plan have been submitted to and approved in writing by the local planning authority (who shall consult with National Highways). Thereafter the construction of the development shall proceed in strict accordance with the approved Construction Traffic Management Plan.

Reason: To ensure that the A2 Trunk Road continues to be an effective part of the national system of routes for through traffic in accordance with section 10 of the Highways Act 1980 and to satisfy the reasonable requirements of road safety and paragraph 115 of the National Planning Policy Framework (2024).

Informative: The CTMP shall include details (text, maps and drawings as appropriate) of the scale, timing and mitigation of all construction-related aspects of the development. It will include, but is not limited to: site hours of operation; numbers, frequency, routing and type of vehicles visiting the site; travel plan and guided access/egress and parking arrangements for site workers, visitors and deliveries; plus sheeting of loose loads and wheel washing and other facilities to prevent dust, dirt, detritus etc. from entering the public highway (and means to remove if it occurs).

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.