

**Gravesend Borough Council**

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**Highways and Transportation**

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**Tel:** 03000 418181  
**Date:** 11 December 2025  
**Our Ref:** AC

<b>Application -</b>	GB/20251116
<b>Location -</b>	Land West Of, Norwood Lane, Meopham, Gravesend Kent
<b>Proposal -</b>	Outline application with all matters reserved (except access) for a development of up to 150 dwellings (Use Class C3), including affordable dwellings, and associated landscaping, public open space and infrastructure

Thank you for your consultation in relation to the above planning application. Kent County Council Highways (KCC) has the following comments to make with respect to highway matters:

**Existing Walking and Cycling Routes**

Routes used by pedestrians and cyclists should be direct, well connected, well lit, attractive and overlooked. There is concern that whilst this may be achievable on the site itself, the routes to / from local facilities do not provide sufficient infrastructure to support the development.

A Walking Audit has been undertaken and is provided in Appendix A. The audit considers four routes, but only considers pedestrians, not cyclists and both should be considered. The audit identifies a number of issues e.g. lack of footways, tactile paving, lighting, surveillance, seating, and dropped kerbs, yet minimal improvements are proposed to address them.

The Public Right of Way (PROW) connection to Denesway is narrow, unlit, has uneven surfacing, and overgrown vegetation. This is unlikely to be an attractive route for some pedestrians (particularly for commuting in winter) and owing to its Footpath designation, prohibits cycle access. There is short section of footway missing on approach to Meopham Station from the A227 (adjacent to Station Road) and pedestrians either have to walk in the road or make a significant detour off the desire line. There is also a lack of dropped kerbs at this junction for people approaching from the A227 (south).

In terms of cycling, at paragraph 4.3.1 the Transport Statement (TS) states "*Although there is no designated cycle infrastructure on the immediate road network, local roads are primarily subject to a 30mph speed limit and relatively level gradient which is conducive to on-street cycling – particularly via Norwood Lane, which also has a low traffic flow.*" However, whilst parts of Norwood Lane may be physically suitable for cycling on carriageway, the southern section is subject to the National Speed Limit (up to 60mph), it is not overlooked, and the entire route is unlit. This is likely to make this route unattractive to new residents, particularly in the winter months when it will be dark before the PM peak. The A227 Wrotham Road is likely to accommodate a relatively significant number of HGVs (although the applicant could confirm the percentage from the survey data) and speed surveys conducted as part of other live planning applications in the area show the 85th percentile speeds exceed the 30-mph limit in a number of

locations. Cyclists currently share the carriageway with motor vehicles, which is likely acceptable only to the most confident of riders. Sections of the route between Meopham School and Meopham Station also lack street lighting and there are no cycle parking facilities at either the local convenience store on the A227 (north of Norwood Lane), which also has stepped access, or at the Camer Parade shops. As a result, the local area is not currently considered to have attractive and high-quality cycling links.

### **Public Rights of Way**

The PROW team should be consulted separately on the application regarding Footpath NS250 and any other routes in the local area.

### **Public Transport**

The site is located within walking distance of both Meopham and Sole Street Stations. However, due to a lack of footway on Green Lane and Camer Road, pedestrians will not be able to access Sole Street Station. Whilst a link would be advantageous, it is not essential.

The nearest bus stops are located on Wrotham Road, approximately 300m – 400m from the western boundary of the site. Therefore, the majority of residents will be located over 400m away, which is above the recommended walking distance, as per CiHT and Active Travel England guidance. Based on paragraph 4.5.1 and Table 4.1 of the TS, the stops are served by the 308 which is very infrequent (approximately every 90 minutes), is not available during the AM peak (0800-0900) and provides no Sunday service. Without enhancement, residents will have limited access to wider transport connections. The existing level of provision is inadequate for the proposed development and must be improved. KCC seeks further discussion on this enhancement, in coordination with other sites coming forward.

### **Local Amenities**

Table 4.4 sets out the local facilities within proximity to the site. A small number of amenities such as a convenience store are available at Camer Parade, approximately 800m from the centre of the site, which is within walking distance for new residents. This route must be attractive to pedestrians and cyclists to reduce car-based trips. Parking at Camer Parade is already close to or at capacity and surveys undertaken as part of other live applications have shown illegal parking in this area which could raise safety concerns if the development adds to this.

There is no supermarket for a weekly shop and a number of the amenities listed are beyond CIHT's 1200m recommended walking distance, e.g. the medical centre, dentist, village hall, leisure centre. Whilst some of these facilities are within cycling distance, the lack of cycling infrastructure in the local area and characteristics of the A227 are likely to limit the number of people who would consider this to be an attractive option.

The Government website states both Meopham Community Academy (primary) and Meopham School (secondary) are operating above capacity with 445 pupils for 420 places and 957 pupils for 832 places respectively, meaning that new residents are unlikely to be able to find a school place in Meopham and will need to travel further afield. Given the lack of sustainable alternatives, this is likely to be by car, which conflicts with the sustainable vision for the site.

### **Vision**

The overall vision in section three of the TS is in line with the National Planning Policy Framework (NPPF) and is supported. However, KCC questions the supporting assumptions and this is discussed in further detail under 'trip generation and distribution'.

## Access

All mode access is to be taken via a new priority junction with Green Lane and can be seen on drawing ITL16459-GA-001 Rev C 'Site Access Arrangements'. It is noted that ITL16459-GA-001 Rev C (page 56) is different to the Site Access Arrangements Plan ITL16459-GA-006 Rev C in the Road Safety Audit (page 105). The correct version should be confirmed to ensure the proposals are clear.

Paragraph 5.2.1 of the TS states "*Visibility splays of up to 58m have been calculated based on current recorded speeds on the road*". However, the 85th percentile speeds are not stated and are required. 58m splays do not accord with DMRB standards. The TS states "*There is also the intention where the speed limit is reduced to 30mph*". However, neither the revised location, nor any changes in roadside environment to help ensure that the speed limit is self-enforcing, are shown. These are required so they can be assessed and secured by condition. Visibility splays have been shown for the crossings on ITL16459-GA-006 Rev C, but the length of the splays is not stated.

It is unclear from the Access plans and Tree Survey Plan whether any of the trees to be removed are located within highway land. KCC do not usually permit the removal of healthy trees and those that are, are subject to financial penalties. This should be clarified.

A new section of footway is proposed to be provided within the site, between the site access and the existing footway to the west, to bridge the existing gap. This is welcomed. However, whilst indicated on the extract, this extension is not shown on plan ITL16459-GA-006 Rev C and as access is not a reserved matter, this is required. The footway must be lit and overlooked to enhance safety and attractiveness to users. No footway is proposed along the Norwood Lane site boundary.

In line with the Kent Design Guide an emergency vehicle, pedestrian and cycle access is proposed to be provided onto Norwood Lane, as shown on plan ITL16459-GA-011 Rev C. Vehicle and pedestrian visibility splays are required for this access. No footways are provided on Norwood Lane along the site boundary so pedestrians would discharge directly into the carriageway which is not recommended. Could additional features be provided here to alert drivers to the fact pedestrians and cyclists will be emerging? It is noted that the Land Use and Access Parameter Plan shows a "*3m planted buffer zone to provide privacy and screening to existing properties to the western boundary*." It would be advantageous to allow for a gap within the vegetation towards the centre of the site boundary along Norwood Lane, for a future pedestrian, cycle and (potentially) bus link, should the adjacent parcel (allocated as GBS3 in the Regulation 18 - Stage 2 2020 consultation) come forward for development.

An additional pedestrian crossing is noted on the Illustrative Masterplan in Appendix C to enhance connections to Camer Country Park. This is welcomed as it would provide the only safe pedestrian link to this area, and should be shown on the access plan along with appropriate visibility splays. However, the footway on the southern side of Camer Road stops just short of the junction with Camer Park Road, discharging pedestrians into the carriageway where visibility is poor. The footway should be extended slightly to follow the bell mouth radius to allow pedestrians clear visibility of oncoming vehicles from Camer Park Road before stepping into the carriageway. If the existing radius is amended to accommodate this, vehicle tracking should be provided to ensure all manoeuvres are still possible. Where possible, the footway should be extended to the café, although part of this route may be third party land and it is recognised that Camer Park Road is likely to be relatively trafficked. It may be beneficial to relocate the proposed crossing further east towards Camer Park Road so it is more on the desire line for new residents, although this may not be possible due to visibility requirements.

Drawing ITL16459-GA-007 Rev B shows 'Proposed Pedestrian Crossing Improvements' at the A227 / Green Lane junction and an uncontrolled crossing across the A227. This conflicts with the proposals submitted under live application GB/20250992 (Land At Wrotham Road), and there is concern regarding reduced access to the existing residential unit who will now be required to reverse into their driveway. The applicant should liaise with the applicant of the adjacent site and agree on an improvement at this junction that either site could deliver. Visibility splays for the crossing must be shown.

Paragraph 5.4.3 states "*There are proposed enhancements to street lighting on Green Lane, with additional street lighting to be introduced, whilst also in keeping with the local limitation of lighting and recognising proximity to the National Landscape.*" The addition of street lighting on Green Lane and elsewhere is required and the proposal is therefore welcomed. However, this is not shown on the plans and is required to ensure it is deliverable and can be conditioned.

Tracking of a refuse vehicle, fire tender and estate car has been undertaken for the site access and is acceptable.

A Stage One Road Safety Audit and Designer's Response for the main site access and emergency access are provided in Appendix D and are generally acceptable.

### **Parking**

At paragraph 2.3.10, the TS states that parking will be provided in line with KCC's parking standards. It is noted that Gravesham Borough Council (GBC) have not yet adopted KCC's parking standards and are currently using SPG4.

### **Crash Data Assessment**

A crash data assessment has been undertaken for a five year period to December 2024. A total of nine collisions occurred during this period with six occurring at junctions. It is noted that two of the nine collisions involved cyclists, which raises safety concerns with the lack of infrastructure and supports the assumption that the A227 is likely acceptable only to the most confident of riders.

### **Trip Generation and Distribution**

The trip purpose and mode share data has been based on TEMPro. However, the results are questioned. For example, the percentage of trips made by 'passengers' seems very high, and in contrast, the percentage of 'car' and 'rail' trips seems low. TEMPro is not site specific and this could have affected the results. This approach requires further investigation and clarification. The resulting anticipated vehicle trip generation of 73 two way trips in the AM and 67 two way trips in the PM seems low. As requested at pre-app, a standard TRICS assessment should be undertaken, or further evidence provided as to why the TEMPRo figures are realistic.

Anticipated trip distribution has been generated using TEMPro for journey purpose, 2011 Census Journey to Work data for employment, and local destinations using Google Maps routing for education, leisure and shopping trips. Three local junctions and the proposed site access have then been modelled for capacity. However, KCC's pre-application advice stated "*The site was not included in the Gravesham Core Strategy, which is the currently adopted Local Plan, and therefore the impact on the wider network has not been assessed and approved. It has also not been assessed cumulatively with other sites in the local area that are likely to come forward around the same time. Traffic modelling should therefore be undertaken using the Kent Strategic Transport Model (KTM)... then, using the outputs, be followed by local junction modelling for any junctions which are likely to be over capacity in the 'with development' scenario.*" This requirement still stands in order for KCC to have a robust understanding of the impact of this site in 2042 (likely end of the Local Plan period) and also the impact when combined with other sites coming forward in the area. This methodology aligns with the KCC

response for other live applications in the area that have come forward ahead of the Regulation 19 Local Plan consultation.

The turning movement diagrams in Appendix G are welcomed. However, some of the percentages are incorrectly shown as 0%. For example, 'Development Distribution % Departures (AM Peak Hour)' shows 62% of trips leaving the site heading west. From here 35% go north on the A227 but 0% are shown to go south. 'Development Distribution % Arrivals (PM Peak Hour)' shows 24% of trips heading south on the A227 but then 0% arriving at the Longfield Road junction. The errors then follow through to the corresponding development trips incorrectly being shown as 0. No HGVs are shown in any of the scenarios. Are the 'total vehicles' actually PCUs? If not, the flows entered into the model will not have taken HGVs into account. This needs to be clarified and the models updated where relevant to ensure all traffic demand has been taken into account.

Vehicle trip generation has been assessed using a vision led three-scenario approach (Base, Vision 1 and Vision 2), which is acceptable. Vision 1 'Education trips' assumes all vehicular trips associated with an education journey purpose will be shifted to active / sustainable modes of travel. This seems very ambitious, and it is questioned whether this is realistic given the school capacity issues set out above. Vision 2 'Education and Employment Trips' assumes the Vision 1 scenario, plus an additional reduction in trips based on "*The context of the site being located within a short and convenient walk/cycle of Meopham Railway Station.*" However, it is unclear how an increase in rail travel will be achieved above the existing mode share when no additional infrastructure is being proposed. Paragraph 6.4.12 of the TS states "*Should Vision 2 be achieved, there is approximately a 20% reduction in vehicle trips in the AM peak hour and circa 12% reduction in vehicle trips in the PM peak hour, compared to the base scenario.*" This is very ambitious given the lack of cycling and bus provision in the local area and is considered to be unrealistic. However, it is noted that junction capacity modelling is based on the 'Base' (worst case) scenario, which is acceptable.

Table 7.3 of the TS sets out the modelling results for the A227 Wrotham Road / Longfield Road junction and shows that the junction would continue to operate within capacity during the future '2030' scenario. It is noted that the modelling outputs show this junction as having a Level of Service 'F' (forced or breakdown flow) due to the lengthy delays. The positive results in Table 7.3 conflicts with the initial modelling work undertaken for live application GB/20250992 (Land at Wrotham Road), which shows the junction over capacity in the future. This conflict is likely to be a result of this site not directly taking into account the cumulative impacts generated by other live applications and other sites likely to come forward as part of the Local Plan. This supports KCCs requirement for strategic modelling using the KTM.

## Policy

With regard to the National Planning Policy Framework (NPPF), and in particular, policies 77 (suitable location), 115 (safe and sustainable access), 117 (safe sustainable transport for all), 148 and 155 (sustainable locations required for green belt sites), the compliance of the proposal is questioned. Whilst the site is within walking distance of some local facilities, additional facilities (such as a supermarket) are likely to require a car to access them. The lack of high frequency bus services serving key destinations, the lack of cycle infrastructure and lighting along the A227 and Green Lane, and lack of footways and lighting on Norwood Lane is a contradiction of NPPF in that there is not a "*genuine choice of transport modes*" available. It is unclear how the Travel Plan will effectively encourage sustainable travel without the necessary off-site infrastructure and services to key local facilities to support these modes. The proposed measures go some way to resolving this, but further measures to the local highway network and bus service, are required.

The site is not allocated in the Gravesham Borough Council (GBC) Core Strategy and whilst it was referred to in the Reg 18 Local Plan consultation (ref: GB36), the Core Strategy remains adopted policy. The site has therefore not been assessed and approved in terms of highways, within adopted Local Plan scenario modelling. The Gravesham Local Plan Regulation 19 consultation has not yet taken place and the application is therefore considered to be premature. A number of applications have recently been submitted in this area, but without an updated Local Plan in place the required infrastructure to cater for such a large cumulative increase in houses, cannot be coordinated, making it difficult for single sites to be acceptable based on what they alone can provide. Further discussions with KCC on a coordinated strategy are sought, to enable the required infrastructure to be delivered.

The TS has reviewed KCC's Local Transport Plan (LTP) 4, but this was replaced by LTP5 in December 2024. LTP5 promotes reducing car dependency, and increasing active travel and public transport. The plan stresses the need for integrated transport networks. Rural sites without access to a reasonable level of public transport or safe walking and cycling routes are inconsistent with this vision.

Paragraph 2.3.8 of the TS refers to the Design for Gravesham Design Code (DC), 2024 Supplementary Planning Document, stating "*Developments must respond to public transport accessibility whilst being appropriate to the context. Developments should demonstrate how they enhance provision for public transport.*" However, there is a lack of high frequency bus provision within the area and no proposals put forward to improve it. This is contrary to the DC. Section 3.11 of the DC is titled "*Future for the rural areas?*" and states, "*Promote a sustainable network of unique villages co-locating key community facilities and commercial activities and better connected by pedestrian and cycling routes and by excellent, cost-effective public transport*" and "*Improved pedestrian and cycling permeability throughout each village*". The proposals do not currently align with the DC.

The TS does not refer to the GBC Local Cycling and Walking Implementation Plan proposals for this area. However, it is noted that the routes are leisure routes and the focus for the development should be the A227 and connections to it, which provides more direct links to Meopham Station and the schools.

No reference is made to the KCC Transport Assessment and Travel Plan Guidance document.

### **Travel Plan Framework**

A Framework Travel Plan (FTP) has been submitted, and the aims and objectives are supported (although KCC disagrees with the statement at 7.1.1 that "*The key use of the Framework Travel Plan is to convert all education trips to and from the site to sustainable modes,*" as the FTP should encourage all trips to be made sustainably).

The Travel Plan measures are generally supported; however, some are considered unrealistic. For example, "*The TPC should ensure that walking and cycling routes to local services and facilities are available to residents. This should include access to local schools and public transport services.*" Excluding measures agreed at planning, this is out of the Travel Plan Coordinator's control.

The offer of a £100 travel voucher to each household is welcomed, but in line with other developments in Kent Thameside, this should be extended in order to cover a reasonable amount of time to embed this behaviour (e.g. 12 months); it should also not be in place of the cycle voucher. However, the current bus service provision is not sufficient to serve the proposed development and therefore this financial incentive can be reviewed alongside general improvements to the service that are required. KCC request further discussion with the applicant on this matter.

Car clubs can be very successful in reducing the need for second cars and encouraging short trips by sustainable modes. Discussions with car club operators should be undertaken to determine the likelihood of one being commercially successful in this location.

The Travel Information Pack should be appended to the Full Travel Plan when this is developed prior to occupation.

Initial mode share targets are based on TEMPro, but as set out in this response, this methodology is questioned. The targets should be based on the trip generation set out within the TS and should be in line with the Vision 2 scenario. However, the figures in Table 7 do not appear to correspond with the reductions shown in Table 7.1 of the TS. Clarification is required.

Monitoring is proposed to be undertaken at years 1, 3 and 5. However, in line with the KCC Transport Assessment and Travel Plan Guidance document, monitoring must be undertaken on an annual basis. Paragraph 10.1.2 of the FTP states "*An initial Year 0 'baseline' survey will be undertaken at 75 per cent occupancy, at which point a Full Travel Plan will be prepared*". The Full Travel Plan will be required prior to first occupation.

## **Conclusion**

KCC raises concerns regarding the lack of sustainable transport and infrastructure to support the proposed development, and the absence of strategic junction modelling. While the vision aligns with national policy, the following issues must be addressed:

- Walking and Cycling: Existing routes to local facilities are inadequate, with missing footways, poor lighting, and no cycle infrastructure, making active travel unattractive.
- Public Transport: Bus provision is severely limited. The nearest stops are beyond recommended walking distances and served by an infrequent service, limiting access to wider transport networks.
- Policy Compliance: The proposals do not align with the NPPF, DC or LTP5, in terms of sustainability.
- Next Steps: KCC seeks further discussion on coordinated improvements to bus services, walking and cycling infrastructure, and strategic modelling to assess cumulative impacts.

KCC would like to place a holding objection on the application until the above issues have been resolved.

**It is important to note that Local Planning Authority (LPA) permission does not convey any approval to carry out works on or affecting the public highway.**

Any changes to or affecting the public highway in Kent require the formal agreement of the Highway Authority, Kent County Council (KCC), and it should not be assumed that this will be a given because LPA planning permission has been granted.

For this reason, anyone considering works which may affect the public highway, including any highway-owned street furniture or landscape assets such as grass, shrubs and trees, is advised to engage with KCC Highways and Transportation at an early stage in the design process.

Across the county there are pieces of land next to private homes and gardens and near the highway that do not look like roads or pavements but are actually part of the public highway.

Some of this highway land is owned by Kent County Council whilst some is owned by third party owners. Irrespective of the ownership, this land may have 'highway rights' over the topsoil.

Works on private land may also affect the public highway. These include works to cellars, to retaining walls which support the highway or land above the highway, and to balconies, signs or other structures which project over the highway. Such works also require the approval of the Highway Authority.

Kent County Council has now introduced a pre-application advice service in addition to a full formal technical approval process for new or altered highway assets, with the aim of improving future maintainability. Further details are available on our website below:

[https://www.kent.gov.uk/roads-and-travel/highway-permits-and-licences/highways-permissions-and-technical-guidance.](https://www.kent.gov.uk/roads-and-travel/highway-permits-and-licences/highways-permissions-and-technical-guidance)

This process applies to all development works affecting the public highway other than applications for vehicle crossings, which are covered by a separate approval process. Further details on this are available on our website below:

<https://www.kent.gov.uk/roads-and-travel/highway-permits-and-licences/apply-for-a-dropped-kerb/dropped-kerb-contractor-information>

Once planning approval for any development has been granted by the LPA, it is the responsibility of the applicant to ensure that before development commences, all necessary highway approvals and consents have been obtained, and that the limits of the highway boundary have been clearly established, since failure to do so may result in enforcement action being taken by the Highway Authority.

The applicant must also ensure that the details shown on the approved plans agree in every aspect with those approved under the relevant legislation and common law. It is therefore important for the applicant to contact KCC Highways and Transportation to progress this aspect of the works prior to commencement on site.

Further guidance for applicants, including information about how to clarify the highway boundary and links to application forms for vehicular crossings and other highway matters, may be found on Kent County Council's website:

[https://www.kent.gov.uk/roads-and-travel/highway-permits-and-licences/highways-permissions-and-technical-guidance.](https://www.kent.gov.uk/roads-and-travel/highway-permits-and-licences/highways-permissions-and-technical-guidance)

Alternatively, KCC Highways and Transportation may be contacted by telephone: 03000 418181.

Yours faithfully

**Director of Highways & Transportation**

\*This is a statutory technical response on behalf of KCC as Highway Authority. If you wish to make representations in relation to highways matters associated with the planning application under consideration, please make these directly to the Planning Authority.