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Highways and Transportation
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TN24 8XU
Tel: 03000 418181
Date: 25 September 2026
Our Ref: AC

Application -	GB/20260207
Location -	Land North of Camer Road, Meopham, Gravesend Kent
Proposal -	Outline planning application for up to 725 dwellings (Use Class C3), a new two-form entry primary school (Use Class F1), a Local Centre (up to 500sqm of Class E floorspace), the provision of Public Open Space including sport and recreation facilities alongside associated access, landscaping, parking, and infrastructure; with all matters reserved except for access.

Thank you for your re-consultation in relation to the above planning application. Kent County Council Highways (KCC) has reviewed the 'KCC Highways Response Technical Note, August 2026' (RTN) and has the following comments to make with respect to highway matters:

Access Proposals

Walking and Cycling Access

The RTN states "*A dedicated pedestrian access has been designed to connect the site directly with Sole Street Station and the applicant is currently in consultation with Network Rail to agree the principle and design of the proposed link...*" This proposal is welcomed. However, KCC requests confirmation that the link has been agreed in principle by Network Rail, and that the route between the residential area of the site and Sole Street Station will be provided with a suitable all-weather surface and appropriate lighting to ensure it remains safe, attractive and accessible for users throughout the year.

The connection is to be provided by means of a ramp, which would improve accessibility for users with mobility impairments and is therefore welcomed. However, use of the ramp would result in an additional walking distance of approximately 60 m compared to a direct route. Where possible, stepped access should also be provided in order to offer a more direct route for those able to use it.

The submitted details indicate that the ramp would be approximately 2 m wide. Given that the route is expected to serve both pedestrians and cyclists, it is questioned whether this width is sufficient to accommodate two-way pedestrian movements and cycle use comfortably. The applicant should therefore consider widening the ramp to a minimum of 3m, or otherwise demonstrate that the proposed width is appropriate. Consideration should also be given to the provision of cycle channels alongside any steps to facilitate cycle access.

It is further noted that neither Sole Street Station nor Meopham Station currently provides step-free access to Platform 2. As a result, access to rail services in one direction may be difficult or impossible for some users, including people with mobility impairments and those travelling with pushchairs. The applicant should therefore confirm whether any improvements

are proposed by either the applicant or Network Rail to address this issue, and whether any discussions have taken place in this regard.

In response to KCC's concern regarding the lack of footway provision along Green Lane between Norwood Lane and Camer Park Road, the RTN states *"Whilst it is acknowledged that there is currently no pedestrian footway along the section of Camer Road between Norwood Lane and Camer Park Road, there is no reasonable opportunity to provide one within the existing adopted highway."* It is also stated that *"The network of new pedestrian routes within the development, including the proposed connections from the site to GB/2025/107994, will create a continuous, safe and attractive walking route to the parade of shops on Wrotham Road."* KCC does not consider this response fully addresses the concern raised. The applicant's proposed strategy relies heavily on the delivery of the adjacent GB/20251116 development (Land West of Norwood Lane). However, that application was refused by the Planning Committee and is currently due to be considered at Public Inquiry in October 2026. As such, there is no certainty that the associated active travel infrastructure will be delivered. Should GB/20251116 not come forward (or not be delivered within a reasonable timeframe), future residents of this development would be left without a convenient pedestrian route to a number of important local destinations, including the existing primary school (during the period before the proposed on-site school is delivered), local nursery facilities, Camer Parade, Meopham Community Centre and Meopham Secondary School.

Whilst an alternative pedestrian route would remain physically available, this would require a significantly longer diversion via the northern end of Norwood Lane and Tradescant Drive. As previously stated, KCC continues to have concerns regarding the quality of this route, including the lack of lighting and incomplete pedestrian infrastructure, and notes that the applicant has not proposed any measures to address these deficiencies beyond the closure of the southern end of Norwood Lane to general traffic. The applicant should therefore demonstrate how a continuous, safe and attractive pedestrian connection to the facilities located along the A227 corridor will be secured independently of any reliance on GB/20251116. In the absence of this, it is questioned whether a Grampian-style mechanism linking the occupation of this development to the delivery and adoption of the adjacent pedestrian connection should be explored.

With regard to KCC's previous request to provide a footway and cycle route along Camer Road, the applicant has confirmed that they do not consider such provision to be necessary or proportionate. KCC remains concerned about this position, particularly given that Camer Road forms a key connection between Meopham and Sole Street and is likely to accommodate increased pedestrian and cycle movements associated with the development, including trips to and from Sole Street Station (by cycle), the proposed primary school and other non-residential uses within the site.

Opportunities to deliver active travel infrastructure along this corridor are constrained by the limited extent of adopted highway land. However, the proposed development represents a significant opportunity to facilitate future improvements along a route that is unlikely to be capable of enhancement by the Highway Authority alone. Accordingly, the applicant is requested to confirm whether they would be willing to safeguard sufficient land adjacent to Camer Road to enable the future delivery of pedestrian and cycle infrastructure should third-party funding or a future delivery opportunity become available.

It remains unclear from Drawing 211206-09 Rev B regarding the active travel route into the site via the northern end of Norwood Lane, whether the connection provides a continuous link to the existing footway network on Norwood Lane. The applicant should clarify this arrangement and demonstrate that pedestrians and cyclists can travel continuously, safely and conveniently along the route. In accordance with the recommendations of the Road Safety Audit, adequate delineation should be provided between the relocated driveway and the

proposed pedestrian and cycle route, together with appropriate corduroy paving, tactile paving and signage where necessary.

KCC's previous consultation response sought clarification as to how the deficiencies identified within the Walking and Cycling Audit (Appendix C of the Transport Assessment) would be addressed. In particular, KCC previously objected to the applicant's suggestion that improvements identified through the audit should be left to future local authority funding streams. Mitigation necessary to make the development acceptable in planning terms should be secured and delivered through the development itself. Whilst KCC welcomes the applicant's commitment towards wider active travel improvements, the following issues remain unresolved and should be addressed:

- Route 1 segment 1 (Site to Sole Street Station) and Route 3 segment 1 (Site to Wrotham Road): The audit highlights a lack of lighting along Camer Road and Norwood Lane. Given that the development would likely increase pedestrian and cycle movements along Camer Road (KCC cannot assume that pedestrians will route through Sole Street Station as the station is privately owned land and access arrangements may change over time), and that Norwood Lane is proposed to form a key active travel corridor connecting the site to the A227, KCC considers that appropriate lighting should be provided. However, it is recognised that local concerns regarding lighting may affect deliverability. This creates uncertainty as to whether the routes can achieve the level of attractiveness, safety and accessibility expected of principal active travel links serving commuters, school users, bus passengers and other users undertaking everyday journeys during periods of darkness. The applicant should therefore demonstrate how the routes will provide a safe, attractive and accessible active travel connections throughout the year, including during winter mornings and evenings. Vegetation clearance must also be undertaken along Route 1 segment 1 to maximise the width of the footway.
- Route 2 segment 1 (Site to Wrotham Road): The audit identifies that "*The footway is uneven in places meaning not all users, including those using mobility scooters, may be accommodated.*" This may form an important connection for residents, particularly if the Green Lane footway proposed under application GB/20251116 is not delivered and adopted. The applicant should demonstrate how these deficiencies will be addressed to ensure the route is available to all users.
- Route 3 segment 1 (Site to Wrotham Road): The audit states "*Some crossing points are provided with dropped kerbs, but there is a lack of tactile paving which may be a hindrance for non-motorised road users.*" Appropriate tactile paving should be provided at relevant crossing points along this route.
- Route 4 segment 2 (Wrotham Road to Bartella's): The audit concludes "*In order to cross the road to the northbound bus stop, there are dropped kerbs provided by driveways, however there are no dedicated crossing points with tactile paving. Given the width of the road in this location, this may make those with reduced mobility feel less safe when crossing.*" The public transport proposals are not yet sufficiently developed to determine how future residents will access bus services. However, should users be expected to access services on the A227, an appropriate crossing facility will be required to enable safe and convenient access to the northbound bus stop.

The applicant states that "*The site benefits from access to a range of existing services and facilities within walking and cycling distance, including convenience retail, education, healthcare and leisure facilities. Whilst it is recognised that there are opportunities to enhance sections of the existing pedestrian and cycle network, the proposed development incorporates a comprehensive package of off-site highway works aimed at improving connectivity and encouraging sustainable travel.*" Whilst a number of facilities are located within walking and

cycling distance of the site, the quality of the available routes remains a concern. For example, Meopham Secondary School is located approximately 2km south of the site boundary. The route is largely unlit, lacks dedicated cycle infrastructure and requires cyclists to share carriageway space with motor vehicles. Whilst cycling may be possible for some users, KCC does not consider that the surrounding highway network currently provides an attractive or realistic cycling environment for a broad range of users, including children travelling independently, less confident cyclists and other vulnerable road users.

Figure 4.1 of Local Transport Note 1/20 indicates that cycling in mixed traffic on roads with a 30mph speed limit carrying significant traffic volumes will generally exclude many potential users and/or give rise to safety concerns. KCC therefore considers that the route is likely to be attractive only to the most confident cyclists and does not represent a realistic alternative to private car travel for many potential users of the development.

KCC therefore welcomes the applicant's proposed contribution towards LCWIP Route 15. However, for the avoidance of doubt, any contribution should be capable of being applied to the emerging cycle route between Istead Rise and Meopham Secondary School currently being developed by Gravesham Borough Council. This route follows the A227 corridor and has the potential to provide a more direct, coherent and deliverable strategic cycle connection between the development and key education and leisure destinations. Accordingly, the contribution should not be restricted to a specific alignment of Route 15.

The non-motorised user route shown on Drawing 211206-09 Rev B (Sheet 9 of the Design Package) does not identify the proposed route widths. Whilst paragraph 2.3 confirms that shared footway/cycleway routes within the development will generally be 3m wide, KCC questions whether this width is sufficient for routes connecting existing residential areas to the proposed primary school. These routes are likely to experience significant concentrations of pedestrian and cycle movements during school peak periods and should therefore be designed to accommodate the anticipated demand safely and conveniently. The applicant should provide justification for the proposed widths and demonstrate that they are appropriate for the level of use expected.

Whilst the visibility splays associated with the proposed crossing shown on Drawing 211206-09 Rev B (Sheet 7 of the Design Package) appear to be generally achievable, the proposed X-distance is not stated and it is therefore unclear whether the crossing has been designed using the desirable 2.0m set-back or the absolute minimum 1.5m set-back. Clarification should be provided. In addition, the southern visibility splay appears to extend into the carriageway rather than terminating at the carriageway edge. The applicant should confirm that the visibility assessment has been undertaken in accordance with the relevant guidance and demonstrate that the required visibility can be achieved without reliance on the running lane.

The applicant has not responded to KCC's previous query regarding the proposed closure of the southern section of Norwood Lane. In particular, no information has been provided as to whether alternative options have been considered, including retaining vehicular access whilst introducing horizontal traffic-calming measures and a high-quality walking and cycling route alongside the carriageway, together with a connection to the adjacent site. Furthermore, should Norwood Lane be closed to through traffic as proposed, the applicant has not addressed KCC's query as to whether frontage development (specifically facing onto Norwood Lane) could be provided along the route in order to create passive surveillance and improve the attractiveness and perceived safety of the corridor.

KCC notes that the previously requested investigation into a potential pedestrian and cycle connection between The Sidings and Meopham Station has not been undertaken. Such a connection could improve access to rail services and reduce walking distances for future residents.

Public Transport Access

Table 2.1 of the RTN expands on the existing bus services serving the area. However, KCC does not consider the statement that *"It can be seen from Table 2.1 that the existing bus services serve the AM and PM peak periods,"* to accurately reflect the level of public transport provision available to future residents. Whilst services are technically present during parts of the day, the frequency, coverage and operating hours of the existing network are not sufficient to provide a realistic alternative to private car travel for this development.

The only services available to future residents for general travel purposes are the 416 and the 306/308. The 416 provides only a small number of services each day and does not operate during the traditional weekday commuter peak periods. The 306/308 provides a limited number of services in each direction and does not offer the frequency or operating hours expected of a service capable of supporting a significant residential development. In particular, the existing timetable would not meet the needs of many commuters, shift workers, evening economy employees or those undertaking journeys outside limited daytime periods. The situation is further exacerbated by the limited Saturday provision and the complete absence of Sunday services. This limits opportunities for future residents to undertake non-car journeys at weekends. In addition, neither the 416 nor the 306/308 currently provides a frequent and attractive public transport connection to a number of key destinations, including major employment areas such as Bluewater and Gravesend town centre.

KCC's concern is not simply whether public transport exists, but whether it provides a realistic, attractive and convenient alternative to private car use for a broad range of day-to-day journeys. The existing level of provision falls short of this threshold and is therefore not considered sufficient to serve a development of approximately 750 dwellings. Without significant enhancement to bus frequency and operating hours, future residents would remain heavily reliant on the private car for access to employment, shopping, leisure and other day-to-day activities. As such, the current level of public transport provision is not considered to align with the objectives of the NPPF to provide genuine transport choice, support sustainable patterns of movement and reduce reliance on private car travel.

The applicant acknowledges the existing limitations in public transport provision and the need for additional capacity, particularly in relation to school travel, and has agreed in principle to provide a contribution towards addressing the latter issue. The applicant has also stated that a *"comprehensive public transport strategy for the site"* has been prepared in discussion with the bus operator, comprising a new hourly 307 service between the site and Gravesend, supported by a dedicated turning facility, driver layover area and welfare facilities, together with a *"high-quality public transport hub, incorporating features such as covered waiting facilities, lighting and real-time passenger information."* Whilst KCC welcomes the recognition that significant public transport intervention is required, insufficient information has been provided to determine whether the applicant's proposed strategy would deliver a realistic, attractive and sustainable alternative to private car travel. In particular, no information has been provided regarding:

- The proposed hours of operation
- Whether an evening service would be provided
- Whether the service would operate on Sundays
- The proposed frequency throughout the day
- The duration of any pump-priming funding
- The mechanism by which long-term viability would be secured, or
- How additional school travel demand would be accommodated.

The KCC Public Transport Note '*Developments in Istead Rise and Meopham*' identifies that the existing 306/308 and 416 services already require significant public subsidy and that the area is currently unsuitable for development of this scale without considerable enhancement to bus provision. KCC's position is that development in this area should support a coordinated public transport strategy focused on safeguarding and enhancing existing services, including increasing frequency, extending operating hours, introducing a Sunday service and providing additional school capacity.

Whilst the applicant is free to promote an independent service, KCC has concerns regarding the lack of information provided and the longer-term viability of a third service operating on the same corridor when both the 306/308 and 416 already require public subsidy.

KCC therefore maintains that the applicant should give further consideration to providing contributions towards the enhancement of the existing public transport network, consistent with the wider KCC Public Transport Strategy for the area and the approach being considered through other planning proposals. This would provide a coordinated, long-term and higher-frequency public transport solution linking Meopham, Istead Rise, Sevenoaks and Gravesend, rather than introducing an additional service whose long-term sustainability remains uncertain.

Until further information is provided, KCC is unable to conclude that the proposed public transport strategy would provide a realistic, attractive and convenient alternative to private car travel for future residents.

Section 2.3 of the RTN states "*Camer Road has been widened to approximately 6.7 metres on the western approach to the proposed roundabout, providing sufficient width for two-way bus movements into and out of the site.*" Whilst this is welcomed, the widening only relates to the section of Camer Road immediately west of the proposed roundabout, within the applicant's frontage. The route between the site and the A227 already accommodates a limited number of bus movements; however, the development proposals are predicated on a significant enhancement to public transport provision and a corresponding increase in bus activity. As previously noted, KCC public transport guidance generally expects bus routes to provide a carriageway width of 6.5m (minimum 6.2m). It is therefore unclear why Camer Road has been widened to approximately 6.7m on the western approach to the roundabout but only 5.5m on the eastern side. The applicant should demonstrate that the 5.5m carriageway width is sufficient to accommodate the level of bus activity anticipated as part of the proposed public transport strategy and confirm that opposing large vehicles, including buses and service vehicles, can safely pass without causing undue delay or conflict.

With regard to the proposed bus stop improvements adjacent to Sole Street Station, KCC does not generally support the use of buff-coloured surfacing due to its long-term maintenance implications. It remains unclear why the proposed pedestrian provision is to be provided at carriageway level rather than behind a kerb, as previously requested by KCC. A kerbed footway would provide a clearer distinction between pedestrian and vehicular space and improve both pedestrian safety and user comfort.

Clarification is also requested as to whether the proposed buff-coloured surfacing encroaches into the existing running lane. If this is the case, it should be set back to align with the existing carriageway markings unless it can be demonstrated that the revised carriageway width remains suitable for its intended function.

In addition, the applicant should demonstrate that a westbound vehicle can safely pass a stationary eastbound bus serving the stop without causing undue delay or conflict, and confirm the remaining effective carriageway width available when a bus is stationary.

KCC's previous request for the provision of a dropped kerb crossing across the station access has not been addressed. This feature would improve accessibility between the station and the proposed bus stop, particularly for mobility-impaired users and those travelling with pushchairs, and the applicant should explain why it has not been incorporated into the revised design.

KCC continues to have concerns that reliance on signing alone is unlikely to provide an effective means of preventing unauthorised use of the proposed bus gate. Given that the majority of development traffic is forecast to travel to and from the west, there is an incentive for drivers to use the route as a shortcut in preference to the main site access. The applicant should therefore demonstrate how the proposed restriction will be enforced in practice to prevent general vehicular traffic from using the route, whilst maintaining access for authorised users. It would be preferable to resolve this issue through an appropriate design solution at this stage, rather than requiring enforcement action or further physical measures to be introduced in the future should the route become routinely used by unauthorised traffic.

Vehicle Access

The main roundabout access to the site from Camer Road has been reduced from a standard roundabout to a compact roundabout, reducing its impact on the local highway network. The revised proposal also addresses KCC's previous concern regarding the proximity of the adjacent access to the east. This is generally acceptable.

The proposal to restrict vehicular access at the southern end of Norwood Lane in order to create an active travel corridor was previously queried by KCC. Concerns were raised regarding the constrained width of Norwood Lane, which often necessitates full road closures to facilitate street works and / or emergencies. In such circumstances, and whilst the internal road network remains in private ownership, KCC would be unable to formally direct traffic through the development as an alternative route. No response has been provided by the applicant to address this concern. KCC therefore requests that a vehicle connection between Norwood Lane and Camer Road is retained until such time as the internal road network has been adopted by KCC. Use of removable bollards or other appropriate measures will prevent general vehicular use during normal operation, whilst permitting access when required due to emergencies or streetworks approved by KCC. Retaining this connection would ensure that, during planned maintenance works, emergency road closures or utility works affecting Norwood Lane, an alternative route remains available for residents, service vehicles and emergency services. Appropriate temporary traffic management arrangements would, however, be required during such periods to ensure that pedestrians and cyclists continue to be accommodated safely and conveniently. The drawings should be amended accordingly.

Swept Paths

Updated vehicle swept paths for a bus, refuse vehicle and fire tender are shown on plans 211206-10 Rev B (sheets 1-6) for the proposed site access roundabout and the Norwood Lane / Camer Road junction. However, there is some uncertainty regarding the arrangement on the southern side of the western arm of the roundabout. On the swept-path drawings, the black double line appears to represent a footway. Conversely, the roundabout design drawing appears to show this area as the 1m minimum clearance strip from the edge of the kerb. KCC assumes the latter interpretation is correct, but requests confirmation from the applicant.

If the black double line represents a footway, the tracked vehicles overrun this area, which would not be acceptable. If, however, it represents the 1m clearance strip, the applicant should demonstrate compliance with Paragraph 3.8.2 of DMRB CD 116, which states "*The swept path for the design vehicle for Figure 3.8.1N1 may impinge by up to 0.3 metres into either the inner or outer 1-metre clearance allowance ('e', as shown on Figure 3.8.1N1) of the central island where there are constraints.*"

KCC's previous response also requested that the turning head be tracked using a larger design vehicle that may need to serve the existing properties on Norwood Lane, which would no longer be able to continue north or south beyond the proposed restriction. Whilst tracking has now been provided for a refuse vehicle, it is foreseeable that larger delivery and servicing vehicles may need to access these properties. The applicant should therefore provide additional swept-path analysis using an appropriate larger HGV design vehicle to demonstrate that the turning head can accommodate all reasonably anticipated vehicle types.

Road Safety Audit

A Stage One Road Safety Audit (RSA) has been submitted for review.

At Problem 2.3, the Auditor identifies concerns regarding the potential for excessive vehicle speeds on Camer Road, reflecting KCC's previous concerns. The Designer's Response states *"During the detailed design stage additional speed restraint features will be explored as considered necessary and appropriate by Kent County Council..."* KCC does not consider this response to be sufficient. The need for speed management measures has already been identified through both the RSA and KCC's previous consultation response. Given that the applicant is proposing to lower the speed limit along Camer Road, it is necessary to demonstrate at this stage how vehicle speeds will be reduced to within the existing and proposed speed limits (as appropriate) through traffic-calming measures rather than deferring consideration of these measures until the detailed design stage.

At Problem 2.4, the Auditor raises concerns regarding the deflection provided on the western arm of the proposed roundabout and the associated potential for side-swipe collisions. The Designer's Response states *"The design of the site access roundabout will be confirmed and provided during the detailed design phase to ensure that the new highway infrastructure is adequately designed in accordance with relevant safety and design guidance..."* Again, KCC does not consider this response to adequately resolve the issue raised. Whilst minor amendments can reasonably be made at the detailed design stage, the outline application should demonstrate that the proposed junction geometry is capable of complying with the relevant requirements of DMRB CD 116, including the provision of adequate entry deflection. Further information is therefore required to demonstrate that the proposed layout provides appropriate deflection and satisfactorily addresses the Auditor's concern.

At problems 2.6 and 2.7, the Auditor raised issues with visibility and capacity at the Camer Park Road, and The Railway Inn accesses, yet the applicant has not proposed any improvements, particularly to visibility. Speed attenuation measures along Camer Road (as requested above) may help to reduce the risk associated with these accesses by lowering vehicle speeds.

Lighting

KCC previously raised concerns regarding the requirement for appropriate lighting. The applicant states that *"The comments on lighting are noted and as the application is for outline planning consent, any lighting assessment as part of the proposed improvements or internal layout would be provided as part of the S278 process at a Reserved Matters stage."* KCC does not consider this response to adequately address the concern raised. The proposed active travel network relies in part, on appropriate lighting to provide routes that are attractive, safe and accessible throughout the year, particularly during winter mornings and evenings. As such, lighting forms an important component of the mitigation relied upon to support the sustainability of the development.

Given the rural nature of the area where lighting is often resisted, KCC remains concerned regarding the deliverability of any lighting proposals, particularly as a significant proportion of the existing lighting within Meopham is maintained by the Parish Council rather than the Highway Authority. In the absence of an agreed maintenance arrangement, it is unclear

whether lighting improvements can be secured and retained in the long term. Further information is therefore required regarding the proposed off-site lighting strategy, associated maintenance responsibilities and delivery mechanism, particularly in relation to the proposed active travel corridor along Norwood Lane. Without this information, it has not been demonstrated that the route will provide an attractive, safe and accessible connection for site users.

Traffic Counts

Regarding the significant Monday peak shown in the traffic count data, the applicant has confirmed that this was the result of a data error. It is questioned whether this error has affected the KTM outputs and this should be confirmed.

Junction Modelling

As requested, the A227 Wrotham Road / Green Lane, Sole Street / Jeskyns Road and proposed Site Access / Camer Road junctions have been modelled for capacity.

The results of the A227 / Green Lane junction modelling indicate that the existing junction is forecast to operate above theoretical capacity in the future AM Peak and within desirable capacity during the PM peak. In order to mitigate the impact of the development, a signal-controlled junction has been proposed, as shown on drawing 211206-12 (Sheets 1-3), with the modelling outputs provided in Appendix G. Whilst the modelling results show the signal junction would operate well within capacity during both peak periods, KCC has concerns regarding the submitted layout, including (but not limited to):

- The substandard lane width on Green Lane
- The significantly short length of the right turn bay
- The substandard width of the crossing
- The presence of existing driveway accesses within the centre of the junction arrangement, which are not shown on the submitted drawings
- The crossing on the Green Lane arm being positioned away from the pedestrian desire line, and
- The absence of a crossing facility on the A227 arm. Whilst a toucan crossing is proposed under GB/20250992 (Land at Wrotham Road), to assist with access to Camer Parade, the application is still live and therefore there is no guarantee this scheme will be implemented.

The applicant is requested to liaise with KCC highways and the KCC Signals team to address the concerns.

KCC is also concerned that there are currently three separate planning applications proposing alterations to this junction, including GB/20251116 (scheduled for Public Inquiry in October 2026) and GB/20250992, which remains under consideration. It is therefore important that any planning permission granted includes appropriately worded conditions and obligations to ensure that multiple competing junction schemes cannot be implemented independently in order to satisfy separate planning requirements. A coordinated and deliverable highway solution will be required.

Regarding the Sole Street / Jeskyns Road junction, the modelling results indicate that the junction is forecast to operate above theoretical capacity during both the future AM and PM Peak periods. The applicant states that the provision of dedicated left and right-turn lanes would mitigate the impact and enable the junction to operate within desirable capacity during both peaks. However, no drawings or supporting information have been provided to demonstrate that such mitigation is physically achievable within the highway corridor and that this will be delivered by the applicant. This information is required in order to confirm that the

identified mitigation represents a deliverable solution and so it can be conditioned to any permission granted. In addition, the applicant is requested to confirm that the modelling includes the cumulative impact of nearby live planning applications, including GB/20251116 (Land west of Norwood Lane), GB/20250992 (Land east of Wrotham Road) and GB/20250993 (Land south of Longfield Road). It is also questioned whether the methodology of simply applying the future KTM flows to the model, rather than applying the difference between the 'future flows' and 'future flows' with development, to traffic surveys, is appropriate, and KCC would welcome further discussion with the applicant on this issue.

Regarding the proposed Site Access / Camer Road roundabout, the modelling results indicate that the roundabout is anticipated to operate within capacity during the future Scenario 3 AM and PM peak periods. This is acceptable.

With regard to the A2 junctions, no further modelling information has been submitted. KCC is aware that discussions between the applicant and National Highways remain ongoing and will await the outcome of those discussions, together with any further information submitted, before providing additional comments on these junctions.

Policy

The National Planning Policy Framework (NPPF) has been updated since the submission of this planning application. Accordingly, this application will be determined against the August 2026 NPPF and the applicant may wish to update the submitted documentation to reflect the current policy position.

Should the proposed ramp connection into Sole Street Station be delivered, part of the site may fall within 800m of the station. However, it is questioned whether Sole Street Station meets the definition of a 'well-connected station' for the purposes of Policy S5(h). The definition requires stations to be served throughout the daytime by at least four trains per hour overall, or at least two trains per hour in any one direction. Whilst Sole Street Station benefits from two trains per hour in each direction during peak periods, the off-peak service reduces to one train per hour in each direction. On this basis, it is not clear that Sole Street Station satisfies the definition of a well-connected station for the purposes of Policy S5(h).

Furthermore, the NPPF definition of 'reasonable walking distance' confirms that where only part of a site falls within the relevant distance threshold, the policy applies only to that part of the site. Should the applicant seek to rely upon Policy S5(h), they should therefore demonstrate that Sole Street Station meets the definition of a well-connected station and the extent of the site that falls within the prescribed walking distance, taking account of the proposed access arrangements and the deliverability of the proposed station connection.

The remaining policy concerns raised in KCC's previous consultation response remain relevant.

Framework Travel Plan

The applicant has confirmed that discussions have been undertaken with Enterprise Car Club, which has advised that the provision of a car club within the development would be viable. This is welcomed and should be secured through any permission granted, together with the proposed package of one year's free membership and £50 driving credit for each dwelling in order to encourage uptake of the scheme and reduce reliance on private car ownership.

Conclusion

KCC wishes to maintain a holding objection on the application until such time as the issues identified above have been satisfactorily resolved. Should Gravesham Borough Council be minded to grant planning permission in advance of these matters being addressed, KCC

requests that, as a minimum, the following planning conditions and Section 106 obligations are secured:

Conditions and S106 Obligations

- The site access points and off-site highway works shown on Drawings 211206-09 Rev B (Sheets 3–9 and 11), 211206-09 Rev C (Sheets 1, 2 and 10) and Drawing 211206-12 (Sheet 1) shall be completed and available for use prior to the first occupation of the development. All access points and associated highway infrastructure within the applicant's control shall thereafter be retained and maintained in perpetuity. In accordance with the recommendations of the Stage 1 Road Safety Audit, the active travel connection onto Norwood Lane shown on Drawing 211206-09 Rev B (Sheet 11) shall incorporate appropriate delineation between the relocated driveway and the active travel route, together with corduroy paving, tactile paving and signage, to ensure that non-motorised users can clearly identify and safely use the route.
- The vehicle connection between Norwood Lane and Camer Road shall remain available for use until such time as an alternative route via the internal road network has been adopted by KCC. The connection shall be restricted to authorised users (emergency vehicles, all vehicles during full road closures of Norwood Lane, or other such users agreed by KCC), through the use of removable bollards or other measures approved by the Local Planning Authority in consultation with KCC.
- Details of the proposed active travel corridor along Norwood Lane shall be submitted to and approved by the Local Planning Authority, prior to commencement. The submission shall demonstrate how the route will provide a safe, attractive and accessible walking and cycling connection throughout the year, including during periods of darkness, and shall include details of any proposed lighting, maintenance responsibilities and delivery mechanisms. The approved scheme shall be implemented prior to first occupation.
- The relocation of the 30mph speed limit shown on Drawing 211206-09 Rev B (Sheet 8) shall be implemented prior to the first occupation of the development. The applicant shall be responsible for the Traffic Regulation Order (TRO) application, all associated costs for promotion and implementation of the TRO, and completion of the necessary highway works.
- The visibility splays shown on Drawing 211206-11 Rev B (Sheet 1) associated with the proposed site access roundabout, shall be provided prior to first occupation of the development and where located within land under the applicant's control, thereafter be maintained free from obstruction exceeding 1.05 metres in height.
- The visibility splays shown on Drawing 211206-11 Rev B (Sheet 2) associated with the Norwood Lane / Camer Road junction, shall be provided prior to first occupation of the development and where located within land under the applicant's control, thereafter be maintained free from obstruction exceeding 1.05 metres in height.
- The pedestrian crossing visibility splays shown on Drawing 211206-11 Rev A (Sheet 3) shall be provided prior to first occupation of the development and where located within land under the applicant's control, thereafter be maintained free from obstruction exceeding 1.05 metres in height, or 0.6 metres in height where they cross the footway.
- Details of speed management / traffic-calming measures along Camer Road to lower speeds in line with the existing and / or proposed speed limit (where relevant), to be submitted to and approved by the Local Planning Authority prior to commencement of development and implemented prior to first occupation.
- The applicant shall use best endeavours to secure and deliver the pedestrian connection between the site and Sole Street Station, as shown on Drawing 211206-101 contained within Appendix B of the KCC Highways Response Technical Note, August 2026. Where approved by the relevant third parties, the connection shall be implemented prior to first occupation of the development and thereafter retained and maintained. To maximise accessibility and promote active travel, the design should,

where feasible, incorporate stepped access in addition to the ramped route in order to reduce journey length for able-bodied users. Consideration should also be given to increasing the route width to a minimum of 3m, or otherwise demonstrating that the proposed width is sufficient to safely accommodate both pedestrians and cyclists. Where steps are provided, cycle channels should also be considered.

- In response to the deficiencies identified within the Walking and Cycling Audit (Appendix C of the Transport Assessment), the applicant must, prior to first occupation of the site (unless otherwise stated):
 - Route 1 segment 1: Submit a lighting scheme prior to commencement of the development, demonstrating how pedestrian safety, attractiveness and accessibility will be enhanced during periods of darkness. Where agreement is reached with KCC and/or the Parish Council regarding future maintenance responsibilities, the approved lighting shall be implemented prior to first occupation of the development. Vegetation cut back shall be undertaken prior to first occupation to maximise the width of the footway.
 - Route 2 segment 1: The route shall be resurfaced prior to first occupation of the development to ensure that it is accessible to all users.
 - Route 3 segment 1: Tactile paving shall be provided at junction crossings and relevant access bell mouths along the route in order to improve accessibility for non-motorised users.
 - Route 4 segment 2: Should residents be expected to access bus services on the A227, an appropriate crossing facility shall be provided to enable safe and convenient access to and from the northbound bus stop.
- Provision of a mobility hub including such measures as a car club, parcel lockers, visitor cycle parking, cycle hire, cycle repair stand, and wayfinding, shall be submitted to and approved by the Local Planning Authority prior to commencement of development. The approved mobility hub shall be fully implemented and available for use prior to first occupation of the development and thereafter retained and maintained in perpetuity.
- A per-dwelling financial contribution (index linked) payable six months following commencement of development towards the design, development and implementation of strategic cycling improvements serving the Meopham area. The contribution shall be capable of being used for improvements to LCWIP Route 15 and/or the emerging cycle route between Istead Rise and Meopham Secondary School, together with any associated works required to facilitate delivery. The final contribution amount and trigger shall be secured through the Section 106 agreement.
- A per-dwelling financial contribution (index linked) towards the enhancement of existing bus services operating within the A227 corridor, payable six months following commencement of development, with the level of contribution being proportionate to that secured through other developments within the area. The contribution shall be capable of being used to support the wider KCC Public Transport Strategy for the Istead Rise and Meopham area, including (but not limited to) safeguarding the existing 306/308 service, increasing service frequency, extending operating hours, introducing a Sunday service, improving connectivity to key destinations including Gravesend and Sevenoaks, and providing additional school-time capacity. Alternatively, should the applicant wish to provide a dedicated bus service as part of the development proposals, that service shall operate for a minimum period of five years, or until full occupation of the development (whichever is longer), and shall provide a frequency, operating hours, destination coverage and level of service sufficient to meet the requirements of KCC's Public Transport Strategy for the Istead Rise and Meopham area. The service shall be supported by appropriate infrastructure, including the proposed public transport hub, covered waiting facilities, lighting and real-time passenger information.

- A Full Travel Plan, prepared in accordance with the submitted Framework Travel Plan, shall be submitted to and approved by the Local Planning Authority, prior to first occupation of the development. The approved Travel Plan shall be implemented upon first occupation and maintained for a minimum period of five years following full occupation of the development. The Travel Plan shall include annual multi-modal surveys at the site accesses, annual monitoring and review of progress against agreed Travel Plan targets, and the submission of monitoring reports to KCC.
- A Travel Plan monitoring fee of £1,422 per five year period, shall be paid to KCC prior to first occupation of the development, in order to enable the review of Travel Plan monitoring reports and ongoing assessment of compliance with the approved Travel Plan.
- Provision of a car club within a prominent location of the development prior to first occupation. One year's free membership and £50 driving credit shall be offered to the first occupier of each residential dwelling on occupation, to encourage uptake.
- A Full Parking Management Plan, based upon the principles set out within the submitted Framework Parking Management Plan, shall be submitted to and approved by the Local Planning Authority, prior to first occupation of the development. The approved Plan shall thereafter be implemented and maintained for the lifetime of the development.
- A Construction Management Plan shall be submitted to and approved in writing by the Local Planning Authority, prior to the commencement of development. The approved Plan shall be adhered to throughout the construction period and shall include, as a minimum:
 - a) Routing of construction and delivery vehicles to and from the site from the strategic road network. In line with the recommendations of the Road Safety Audit, swept path analysis shall be provided demonstrating that construction vehicles can safely access the site via local roads, including (but not limited to) Camer Road. Where necessary, additional temporary or permanent carriageway widening shall be provided to facilitate safe access
 - b) Details of the parking and turning areas for construction and delivery vehicles and site personnel
 - c) Timing of deliveries (avoiding network and school peak hours where possible)
 - d) Provision of wheel washing facilities and / or other measures to prevent mud and debris being deposited on the public highway
 - e) Provision of measures to prevent the discharge of surface water onto the highway
 - f) Details of any temporary traffic management, signage, road closures, diversions or other highway-related measures required during the construction period.

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>.

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>. 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.