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Tel: 03000 418181
Date: 25 March 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 consultation in relation to the above planning application. Kent County Council highways (KCC) has the following comments to make with respect to highway matters:

Summary

KCC has concerns regarding the sustainability and highway impacts of the proposed development. In particular, there are shortcomings in the walking, cycling and public transport infrastructure surrounding the site, which currently does not provide safe or attractive alternatives to private car use. Further concerns relate to the absence of local junction modelling, the limited bus service provision, and the scheme's current inconsistency with policy.

The Site

The existing site is located to the north of Camer Road and east of Norwood Lane, in the village of Meopham and is currently formed of mainly open fields.

Existing Access

Walking and Cycling Access

As set out at pre-app stage, 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 and Cycling Audit (WCA) has been undertaken with the results presented in the Transport Assessment (TA) Appendix C. A number of issues are highlighted including narrow or complete lack of footways along key routes (e.g. Green Lane), vegetation overhang, lack of lighting, lack of dropped kerbs, uneven surfacing, lack of cycle parking at local destinations, stepped access only at some destinations. The TA states "*Where issues are identified in this [WCA] assessment, these should be reviewed by the local authority and appropriate funding streams or mechanisms for implementation identified if appropriate as part of authority wide*

improvements.” This is not acceptable; the developer must implement improvements where required, prior to first occupation, in order to ensure new residential / site users have appropriate walking, cycling and public transport connections between the site and local destinations.

Section 3.10 of the TA relates to the Gravesham Borough Council (GBC) Local Cycling and Walking Infrastructure Plan (2022) and Figure 3.1 shows the two routes proposed in the vicinity of the site. The TA states “*As part of this TA, consideration is given to how future occupiers of the site could utilise the route and whether the proposed development can support its provision.*” However, no further detail is provided. Both routes are currently sub-standard and it is requested that GBC and the applicant decide which route should be prioritised so improvements can be directed towards it. KCC’s Active Travel team’s preference is for Route 15, across the site rather than along Sole Street as this avoids the pinch point over the railway bridge. As well as rolling rails on the railway bridge for NS192, rolling ramps at Sole Street and Meopham stations are recommended.

Please note the Kent County Council Walking and Cycling Implementation Plan identifies Norwood Lane as a key route (CR15).

Public Transport Access

The existing bus provision in the area is poor, so whilst bus stops may be physically present, the bus connectivity is not appropriate to serve the development. The TA does not set out the first and last bus times for each service and it is therefore unclear as to whether the AM and PM periods are served.

Paragraph 2.11 of the TA states “...*However bus service frequency across both weekdays and weekends may affect the viability of daily bus travel except for school trips.*” The KCC Public Transport Note (sent to the applicant in January 2026) confirmed that school bus provision in this area is understood to be operating at full capacity and therefore consideration will need to be given as to how new development safeguards the provision of additional capacity needed to cater for additional demand.

Meopham Train Station is located within 750 metres of the northern boundary of the site and Sole Street is located on the northern boundary of the site, which is very advantageous. However, the pedestrian and cycle routes to both stations are substandard in places (or non-existent with regard to cycle routes) and both stations lacks step free access to platform two. Use of the stations is therefore likely to be less attractive than if appropriate routes were available, particularly for those with mobility impairments, walking aids or prams.

Vehicle Access

There are currently no vehicle access points into the site.

Local Amenities

There are a small number of local amenities within walking and cycling distance of the site, including a post office, convenience stores, GP, nursery, schools and a leisure centre. However, the walking and cycling links to these facilities are poor or absent in places, meaning that car trips are likely to be the dominant mode to a number of them. The links must be improved and any gaps in the network need to be filled.

The provision of a school on site is welcomed as this will reduce off-site trips. Attractive and high-quality walking (and where required) cycling routes between the residential units and the school will be expected at reserved matters application stage. It is noted that the school is unlikely to be delivered from the outset and therefore walking and cycling links must be present to / from existing schools.

Crash Data

A crash data assessment has been undertaken in section 2.1 and concluded that “*Therefore, whilst any collision is unfortunate, there is not deemed to be any inherent safety issues with the local highway network so there is no need for further investigation.*” However, of the five serious collisions that occurred, four involved vulnerable road users (three cyclists and one motorcyclists). This suggests that the existing network may not provide a safe network for these users and additional trips from the proposed development may exacerbate this, without improvements to the walking and cycling network being implemented. This reinforces the need to provide improvements.

Traffic Counts

The traffic data on the first two pages of Appendix D shows a significant Monday peak, which is questionable and is not reflected in the ATC data. Clarification is required as to whether this is an error and whether this error affects the rest of the assessment.

Development Proposals

The development proposes to provide up to 725 residential dwellings (use class C3) with 50% private and 50% affordable, a two-form entry primary school (use class F1), 500sqm of commercial use (use class E), 750sqm club house (use class F2(b) and two sports pitches (use class F2(c)).

The Vision for the site is made up of six principles, including “*Principle 1: Residents can walk, wheel or cycle safely to local facilities,*” and “*Principle 3: Residents can viably travel to key destinations by bus and rail.*” Whilst this may be possible for the new school, it is questioned whether this is achievable to facilities outside of the site due to such things as the lack of footways, cycle ways, crossing points and unlit streets.

Access Proposals

Vehicle Access

The main vehicle access to the site is proposed to be via a new roundabout onto Camer Road. An emergency access will be provided onto Norwood Lane. The principle of this strategy is acceptable.

The internal road network is to comprise of a 6.75 metre primary route, a 5.5 metre primary street and a 5.5 metre secondary street. The figures relate only to carriageway width and it is questioned why the widths required for footways and cycle routes are not also being secured at this time, as shown in the Design and Access Statement (DAS).

Please can the applicant confirm why a roundabout has been proposed in lieu of a priority junction, which would be more in keeping with the surroundings and are usually safer for pedestrians and cyclists? The roundabout has a large diameter of 45m, however, paragraph 13.12.1 of the Design Manual for Roads and Bridges (DMRB) CD116 states “*On a single-carriageway road, where predicted flows are low and increased lane width is not operationally necessary, a compact roundabout with single lane entries should be used.*” Please confirm why a compact roundabout (possibly with HGV over run areas) has not been proposed / provide justification for the large diameter, and that the entry path radius is in line with DMRB.

There is an existing vehicle access to the east of the roundabout circulatory, on its eastern arm, and KCC are concerned this is too close to the roundabout entry and exit. Further information should be submitted to confirm the proximity of the access complies with DMRB, and this should include vehicle tracking to demonstrate that vehicles can safely access and egress this link with the roundabout in place.

No footways or cycle routes are shown on the roundabout site access plan and these are required. Please confirm why the footway within the site stops prior to the roundabout instead

of continuing around it. It would be beneficial for a footway and cycleway to continue along Camer Road east to Sole Street Station and west to the A227. At section 4.4, the TA states "*Camer Road to be widened to a continuous 5.5m east of the proposed site access roundabout to Royal Hounds Dog Park.*" Public transport guidance states bus routes should have a carriageway width of 6.5m (minimum 6.2m) (which again lends the design to focus on improved facilities along Camer Road), although it is recognised that Camer Road is an existing bus route.

The 30mph speed limit along Sole Street is proposed to be extended along Camer Road, to the existing 30mph section on Green Lane, removing the derestricted section. This is supported. However, as the Automatic Traffic Counter (ATC) showed the 85th percentile speeds were above 30mph (41mph eastbound and 37mph westbound), speed attenuation measures must be provided at appropriate intervals set out in the Kent Design Guide, so the 30mph is naturally enforcing.

Walking and Cycling Access

The southern end of Norwood Lane is proposed to be restricted to general vehicle traffic, creating an active travel corridor. Whilst the principle of an active travel corridor is supported, there is no justification as to why existing vehicles are to be restricted, and KCC is concerned that the lack of lighting and passive surveillance (from existing vehicles) would result in an isolated link that would not be attractive to pedestrians and cyclists, particularly when it is dark. This should be addressed.

Whilst it is recognised that the application is Outline and therefore only the land use plots are shown on the parameter plans, it is questioned whether the applicant would commit to having frontage development along Norwood Lane that would create passive surveillance, or whether consideration has been given to maintaining the existing vehicular link along Norwood Lane, incorporating horizontal speed attenuation measures, and providing a high quality walking and cycling link alongside it? It is unclear how many new residents would be likely to use this section of Norwood Lane in favour of walking through the site on high quality routes, emerging onto Norwood Lane further north. There is also concern that the 'no entry' sign alone will not deter people from using this access for general use and further consideration of this is required.

The applicant will be aware of the live application for the adjacent site, west of Norwood Lane (GBC/2025/107994) and it is requested that the applicants discuss the proposals for Norwood Lane, to deliver a joint high-quality scheme (one that is of course not reliant on the other coming forward). As a minimum, there should be a key active travel link between the sites, particularly given the draw of non-residential use and the school that would result in trips between the two. It is also noted that the adjacent application proposes an emergency access onto Norwood Lane in the vicinity of the proposed turning head, and this must not be prevented under this application. There is likely to be a new link created by the adjacent site, between Norwood Lane and the existing footway on Green Lane, but the applicant cannot rely on that being delivered unless a Grampian condition was applied, which could lead to a ransom situation.

The new school and sports facilities are likely to draw existing residents from both Sole Street in the northeast and Meopham to the southwest, with the latter also likely to be a draw itself due to the presence of the facilities at Camer Parade. However, the route between these places is either substandard or non-existent. For example, from Sole Street, pedestrians and cyclists would need to travel along Camer Road, which only has a very narrow footway and no cycle facilities. From Meopham, pedestrians and cyclists are likely to travel along Green Lane and Camer Road, which has a narrow footway and no footway at all between Camer Park Road and Norwood Lane (the active travel link at Norwood Lane directing pedestrians

straight into the junction). The applicant should confirm what safe and suitable routes are available for these trips.

It is unclear at this Outline stage whether the routes within the site are to be adopted or not. If not, this could prevent future key links being created between Meopham and Sole Street, as applicants would not be able to assume use of the new routes and due to space, would also not be able to widen Camer Road to provide a sufficient footway and cycle route. It is strongly recommended that pedestrian and cycle facilities are provided along Camer Road, between Sole Street and Green Lane.

The placement of the crossing east of the dog park is questioned. Should vehicles exceed the 30mph speed limit, visibility to the crossing from the south may not be sufficient due to the bend in the road. The crossing is likely to be more beneficial slightly further south, on the bend, where visibility can be increased (and creating a direct link to the dog park), with an additional crossing adjacent to the pub, reducing the time pedestrians need to spend on Camer Road, should a new footway not be provided.

The existing link to Sole Street Station and the adjacent bus stop is currently poor, and will not be significantly improved by the applicant, despite the Environmental Statement Transport Chapter (ESTC) paragraph 5.96 stating that the development will result in an additional annual average daily flow of 2,009 vehicles. Residents will need to cross Camer Road only to cross back again a short way along the road. People waiting at the bus stop do not have a raised kerb to wait on and it is recommended that the area in front of the bus stop and the southern radius of the bell mouth into the station (should this be highway land), is kerbed for additional protection from vehicles, and an uncontrolled crossing is provided across the bell mouth.

It is strongly recommended that the applicant provides a link directly into Sole Street Station car park from the northern boundary of the site, as this could provide a direct, convenient and high-quality route to a train station. If this is not possible, justification should be provided. A link should also be explored to Meopham Station from The Sidings.

The pedestrian and cycle link onto the northern end of Norwood Lane is welcomed as this adds permeability to the site and allows pedestrians and cyclists the opportunity to connect to a new high-quality footway and cycleway as soon as possible from the existing network.

The provision of a mobility hub is welcomed.

A masterplan proposal has been provided in the DAS. Whilst this on-site layout does not form part of this Outline application, it is recommended that pedestrian links are created between the east-west active travel route through the site, and the Norwood Place and Camer Gate sections of the development.

Public Transport Access

The proposals allow for bus access through the site and a new bus stop outside of the primary school. This is welcomed and the intention is aligned with fulfilling a sustainable vision for the site. However, the existing bus services are not considered appropriate to serve the development and no information has been provided to demonstrate that the existing services will be sufficiently enhanced to meet the needs of a large development, or that the service providers would be willing to divert existing services into the site. Section 4.4 of the TA considers the diversion of the 416 and states "*It is recommended that a Planning Condition to secure a detailed Public Transport Strategy is the best mechanism to complete this.*" However, given the poor public transport provision available currently, and lack of a clear strategy to improve this, the public transport strategy must be agreed at this application stage to ensure the site will have safe and suitable public transport access.

The applicant is aware that the KCC Public Transport team have put forward a strategy for this area of Gravesham that requires developer contributions to enhance the 308 bus service, providing a reasonably high frequency service along the main north-south route through Meopham, to serve key destinations, seven days a week. The pedestrian and cycle access to the north of the site is located approximately 400m from the nearest bus stop serving the 308 (although the implementation of an uncontrolled crossing is required across the A227 to reach the northbound stop). This means that all of the new residents will be located in excess of this distance. Further stops are provided adjacent to Green Lane, approximately 600m (southbound) and 750m (northbound) from the site's active travel route at the Norwood Lane / Camer Road junction. These distances are generally considered too far for people to have to walk to a bus stop and are a concern. Whilst the 311, 416 and 695 services run along Camer Road, their frequency is very poor and not suitable to serve a development of this scale (and it is also noted from the indicative phasing in the DAS that the bus road would not be provided until Phase two). It is therefore likely that the 308 would be the most attractive service to the new residents, even at an increased distance.

The development must ensure the site has access to a frequent bus service, seven days a week, connecting the site with places people want to go to. It is therefore requested that the applicant provides detailed information demonstrating either (a) an agreed enhancement and diversion of the existing services along Camer Road (including addressing the capacity issues of school services), (b) a new service, or (c) provide a per-dwelling contribution to the KCC Public Transport Strategy to enhance the 308 and school services. The latter is in line with other non-allocated and allocated developments likely to come forward in the area and is likely to be the most realistic and feasible option to enhance connectivity for the development.

Swept Paths

Vehicle swept paths for a bus, refuse vehicle and fire tender are shown on plans 211206-10 Rev A (sheets 1-6) for the main site access roundabout and the Norwood Lane / Camer Road junction. These are acceptable. The turning head should be tracked for a larger vehicle that may serve the existing houses along Norwood Lane, which would no longer be able to continue north / south.

Visibility Splays

43m visibility splays are shown on plan 211206-11 Rev A (sheets 1-4) for the site access roundabout, the emergency and bus access at Norwood Lane and the two crossing points on Camer Road. The splays are generally acceptable, assuming additional speed restraint measures are provided on Camer Road to naturally enforce a 30mph limit.

Road Safety Audit

A Stage One Road Safety Audit has not been submitted with the application and is required.

Trip Generation

The trip generation methodology and results were discussed with KCC at pre-app and were accepted on 29.10.25.

However, it is questioned whether all of the trips associated with the Class E use are likely to be internal to the site, as whilst KCC agrees that there is likely to be high internal mode share, the facilities in Meopham are very limited and if this is different to what is already on offer, it is likely to generate some external trips.

Trip Distribution and Junction Modelling

As requested by KCC, the applicant has undertaken highway capacity modelling using the Kent Transport Model (KTM), to present a strategic view of capacity issues on the surrounding network. The following three scenarios have been assessed:

- Scenario 1: 2042 without Development (without Galley Hill Road);
- Scenario 2: 2042 with Development (without Galley Hill Road); and
- Scenario 3: 2042 with Development (without Galley Hill Road) plus Local Plan cumulative developments.

The trips were distributed in line with the KTM. This is acceptable.

The modelling outputs in Appendix J and the ESTC show a significant vehicle flow on the local highway network around the site, which is to be expected. Local junction modelling should be undertaken for the A227 Wrotham Road / Green Lane and Sole Street / Jeskyns Road junctions, to demonstrate that these will operate satisfactorily, or that nil detriment is achievable.

The site access junction has been modelled for capacity using appropriate modelling software and the results show it is predicted to operate within capacity. However, this is based on scenario 2. A sensitivity assessment should be undertaken for scenario 3.

It is understood that National Highways has requested further information for the A2 junctions, which are on the strategic road network. KCC will await this information before providing further comments.

Policy

With regard to the National Planning Policy Framework (NPPF), section three of the TA quotes a number of paragraphs including 115 which states *“Safe and suitable access to the site can be achieved for all users,”* and *“Any significant impacts from the development on the transport network (in terms of capacity and congestion), or on highway safety, can be cost effectively mitigated to an acceptable degree through a vision-led approach,”* and paragraph 117 which states *“New developments should a) give priority first to pedestrian and cycle movements, both within the scheme and with neighbouring areas.”* In addition to that set out in the TA, paragraph 110 states *“Significant development should be focused on locations which are or can be made sustainable, through limiting the need to travel and offering a genuine choice of transport modes.”* Paragraph 116 states *“Development should only be prevented or refused on highways grounds if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the road network, following mitigation, would be severe, taking into account all reasonable future scenarios.”* This cannot yet be determined. Paragraph 155 states green belt sites would not be regarded as inappropriate where (amongst other things), *“The development would be in a sustainable location, with particular reference to paragraphs 110 and 115 of this Framework.”* Failure to provide genuine sustainable travel options appropriate even to a rural context means the proposal would be inconsistent with NPPF requirements.

The TA also references the NPPF consultation 2025, which states *“Mixed-use developments which would be within reasonable walking distance (800m) of a railway station would be supported,”* and *“Ensure development is located where it can support sustainable patterns of movement where a genuine choice of transport modes is available.”* The consultation is not adopted policy and therefore bears no weight on this application. However, it is noted that only the northern most part of the site boundary is within 800m of the station, and it is questioned whether there is a *“Genuine choice of transport modes,”* for site users.

With regard to the Planning Practice Guidance, the TA states *“Measures to improve accessibility of the location where these are necessary to make the development acceptable in planning terms,”* but despite the WCA demonstrating the need for improvements outside of the site, none have been proposed.

With regard to the Department for Transport Circular 01/2022, the TA quotes the following sections: *“Steers new development towards locations and designs that reduce dependency on private cars and favour walking, cycling and public transport;”* and *“Reducing car dependency: new developments should aim to be located where sustainable transport is, or can be made, feasible.”* It is questioned whether this is achievable.

No reference is made to the Gravesham Design Code. However, section 3.11 of the Code 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 Design Code.

The Policy Summary section at 3.11 of the TA states *“The planning policy set out above collectively seeks to ensure that development is located where residents, staff and visitors are provided with genuine modal choice by situating development in locations that reduce the need to travel, reduce average journey lengths and benefit from local infrastructure to enable use of modes of transport other than the single occupancy private car.”* It is questioned whether the development proposals are compliant with the collective aim given the improvements required on the surrounding walking and cycling network.

Further work is required by the applicant to demonstrate that the proposals align with national and local policies.

Public Rights of Way (PROW)

The PROW proposals should be discussed with the KCC PROW team.

Framework Travel Plan

A Framework Travel Plan has been provided and the aims and objectives are supported. However, it is questioned whether the 10% reduction in car-based trips (outside of the trips to the on-site school) is achievable, given the quality of or lack of walking and cycling links outside of the site to key destinations, and the poor-quality bus service.

Section 7.7 refers to car sharing and states *“If a car club is considered to be viable, residents will be provided with one year’s free membership as well as £50 driving credit to encourage uptake.”* This is welcomed. However, the applicant should liaise with car club companies and provide confirmation as to whether this is viable. If so, the applicant would be expected to fund the car itself. The document also refers to trying to negotiate discounts for one year’s free public transport ticket. If existing services are diverted into the site, this contribution should be provided by the applicant to encourage take up.

The document states the targets will be reviewed and refined following the baseline travel survey results. However, the targets for a reduction in car trips must not be reduced.

The text under Figures 3.3 and 3.4 regarding walking and cycling isochrones is misleading given the poor quality and / or lack of pedestrian and cycling routes in this area.

A school specific Travel Plan will be required prior to first occupation.

Framework Parking Management Plan

A Framework Parking Management Plan has been submitted but contains limited information at this stage. A Full Parking Management Plan will need to be conditioned to any permission granted.

Lighting

Section 4.4 of the TA states active travel routes will be well lit, yet no lighting plans are provided and these are required to demonstrate they can be delivered (particularly on Norwood Lane). Please note whilst KCC would be open to taking on maintenance of lighting, it would need to meet minimum specifications. KCC do not maintain the majority of the lighting within Meopham, and it is suggested that discussions are undertaken with the Parish Council. Any street lighting that may be provided within the site needs to be co-ordinated with tree planting to ensure there is no detrimental effect on the lighting levels.

Conclusion

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>.

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.