

Appendix A

Pre-Application Responses



Non LPA

Highways and Transportation

Kroner House

Eurogate Business Park

Ashford

TN24 8XU

Tel: 03000 418181

Date: 10 June 2025

Our Ref: AC

Application - PAP/2025/23

Location - Land East of Wrotham Road, Meopham

Proposal - Outline (pre) planning application with all matters reserved except for access, for up to 350 residential dwellings with access taken from Wrotham Road to the north-west of the site.

Thank you for providing information relating to pre-application proposals for a development on land to the east of Wrotham Road, Meopham. This response follows a site visit undertaken by KCC on 02.06.25.

The Site

The existing site is located to the east of Wrotham Road and south of Green Lane, in the village of Meopham and is currently formed of open fields.

The site is located in rural Gravesham and KCC are very concerned about whether sustainable access can be achieved. Overcoming this issue should form a key part of the Transport Assessment. The development proposals must be in line with NPPF.

Proposal

The proposal is for approximately 350 residential dwellings (Use Class: C3) with all matters reserved except for access.

It is noted that you have also submitted a pre-application proposal for 120 residential dwellings on land to the south of Longfield Road, although to clarify, this response is based solely on the Scoping Note for land to the east of Wrotham Road. Paragraph 2.2 and 2.3 of the Scoping Note states that whilst they will be separate applications, *“Both planning applications will consider future scenarios where the other development comes forward (subject to planning permission), on a similar timescale and each will consider the other as a committed development for testing purposes”*.

Policy

The Transport Assessment will be developed in line with NPPF. However, the Scoping Note makes no reference to a vision-led approach.

The site is not allocated in the GBC Core Strategy and whilst it may have been referred to in the Reg 18 Local Plan consultation (site GBS-D), the Core Strategy remains adopted policy.

KCC's Parking Standards were updated earlier this year, however it is unknown if these will be adopted by GBC, who currently use SPG4.

Please ensure any cycle facilities are in line with LTN 1/20 and any bus priority measures are in line with LTN 1/24.

The GBC 'Local Cycling & Walking Infrastructure Plan' (LCWIP) and KCC LCWIP should be reviewed.

Public Transport

The site is located within walking distance of Meopham train station, although the walking and cycling route to this facility should be reviewed in the Walking and Cycling Audit detailed later in this response. Consideration should be given as to whether people are likely to drive to Ebbsfleet Station for the high speed line to St Pancras or south east Kent.

The site is within walking distance of bus stops on Wrotham Road but the northbound stop does not have a shelter. Bus journey times to key facilities should be set out, along with confirmation as to whether they serve Meopham Station and Ebbsfleet Station.

The bus services in the vicinity of the site are not high frequency services and are limited during the peak hours and at weekends, with no services at all on Sundays. Discussions should be undertaken with local bus operators to determine what improvements could be made to improve the bus provision for the site. As it stands, the existing bus provision is not considered suitable to serve this site.

Ideally, a public transport strategy would be formed with other emerging sites in the area, to ensure that the site does not prohibit future development with regard to bus provision and in fact helps to support it. KCC are happy to facilitate an introduction to relevant consultants if that would be of interest.

Buses need to run to a strict timetable and any delays at all can result in negative attitudes towards the services. High quality facilities and dedicated bus lanes (where relevant) can assist in reducing this view.

It would be useful to understand where the major employment centres are in relation to the site, and how access to them can be achieved by sustainable modes. The major employment centres can be obtained from the Office for National Statistics Nomis website and filtered e.g for areas with over 500 jobs, although other assumptions can be made e.g Gravesend town centre, Bluewater, Ebbsfleet.

Walking and Cycling

Table 5 of the Scoping Note sets out a number of local facilities that are within the vicinity of the site. This list should be expanded to include the nearest (large) supermarket, Meopham Station and a parcel drop off (unless one is to be provided on site).

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 detailed walking and cycling audit to key facilities should be undertaken for inclusion in the Transport Assessment to identify any existing issues and propose improvements where required. The assessment should include a plan showing the most direct routes for pedestrians

and cyclists, and be supported by photographic evidence. Things to be highlighted and considered as part of this assessment are as follows (but not limited to):

- Severed links / lack of footways
- Severed links / lack of cycleway (and where there is a lack of cycle routes, whether it is considered suitable to cycle on carriageway for all users including children accessing schools)
- Any landscaping strips or other physical structures separating the footway / cycleway and carriageway
- Lack of dropped kerbs and tactile paving
- Whether secure cycle parking is provided at destinations (e.g shops, schools, train station)
- Narrow footways (including those narrowed by over grown vegetation)
- Barriers for cycles, prams, wheelchairs, mobility scooters
- Flooding or ponding
- Damage to, and / or inappropriate surfacing
- Lack of street lighting
- Overhanging or encroaching vegetation that needs to be cut back
- Identification of routes that do not feel safe or are not likely to feel safe, especially in the winter months
- Whether people were observed crossing in inappropriate areas /having difficulty crossing /difficulty travelling along routes
- Routes with stepped access only
- Gradients that may reduce the attractiveness of walking and / or cycling
- Vehicles parked on the footways
- Any perceived speeding issues which may result in a reduction in walking and cycling.

Whilst the application will be Outline, the Transport Assessment will need to set out the principles of what will be delivered on site to encourage use by sustainable modes. This could include things such as mobility hubs, high quality cycle parking facilities (one per bedroom), segregated cycle routes, 2m (min) footways. A number of commitments would also be required to further encourage sustainable travel. It is suggested that this includes such things as parcel lockers, car clubs and a year's free public transport ticket for each house (or the equivalent in value provided as Mobility as a Service (MaaS) credit, if the project is operational at the time). Further information can be found here:

<https://www.go-fastrack.co.uk/fastrack-news/mobility-as-a-service/>

PROW

The KCC Public Rights of Way (PROW) team should be consulted separately as the proposals will have an impact on the existing PROW westprow@kent.gov.uk.

Access Proposals

The vehicle access proposals are shown on drawing T25512.001 Rev A.

The access is proposed to be designed in line with the 'Local Distributor Road' geometry set out within the Kent Design Guide, but as the development quantum only just exceeds the threshold, the internal access road is proposed be designed in line with the 'Major Access Road' geometry. KCC do question whether the 'Local Distributor Road' geometry of 10m radius and 6.75m carriageway is appropriate given the site is only supporting residential development and is located within a 30mph zone. Large junction radii result in pedestrians having to cross larger bell mouths and / or requiring further deviation from the desire line, and wide carriageways encourage higher vehicular speeds.

There are driveways located along the western side of Wrotham Road within proximity to the

proposed access. In line with the KCC guidance, driveways should not be located within 10m of a junction. This should be referenced on the plan highlighting how the access meets this standard.

The right turn bay is welcomed.

The site slopes down towards Wrotham Road. The site access plan should set out the proposed gradient so this can be checked against the standards in the Kent Design Guide. It is considered likely this is achievable.

For the planning submission, please ensure the plan shows the highway boundary and all of the required dimensions e.g. turning length, deceleration length and direct taper length, so these can be checked against DMRB. Any departures from standard (e.g. minimum distance between the proposed access and the Green Lane junction) should be highlighted on the plan and justification given in the text. Please also submit the plan showing the existing layout, so a comparison can be made.

The annotations on the plan state "*Short section of build out and removal of section of parking bay to accommodate pedestrian crossing*". It is unclear which parking bay is being referred to and who this serves.

There is an existing uncontrolled crossing point to the south of the Camer Parade egress, but this is not referred to on the plan. The proposed crossing is further south than the existing and may be off the desire line for people wanting access to the southern end of Camer Parade. It is unclear whether the width of the proposed refuge meets appropriate standards as the existing physical island is relatively narrow. This may be used by parents (possibly with prams) and children (possibly with cycles / scooters) from the proposed developed, accessing the primary school and this should be considered. It is also unclear what the route is to the bus stop / through Camer Parade from the proposed crossing, as this is a car park. The existing footway shown on the plan between the crossing and the bus stop looks very narrow. The plan should be updated to include this information.

A 2m footway is proposed to be provided along the western side of the site (eastern side of Wrotham Road), tying in to the existing footway north of Longfield Road. However, as the site boundary continues further south, consideration must be given to widening the route to serve both pedestrians and cyclists along the entire boundary. This would assist with walking and cycling to the school and also for cyclists who currently need to travel on the carriageway and who are likely to be travelling at a slow speed given the uphill gradient.

Paragraph 3.18 states "*The emergency access point will serve as an additional pedestrian / cyclist access point, providing, a link close to the dropped kerb pedestrian crossing on Wrotham Road*". Paragraph 3.19 states "*Further pedestrian/cyclist access points are to be provided at the northern, eastern, and southern boundaries of the site, providing access to a proposed circular walk and natural play trail, as well as access to Green Lane and Camer Park (via an existing PRow)*". As access will not be reserved, these need to be shown on a scaled plan with appropriate dimensions.

The visibility splays are shown to be higher than for a 30mph road which suggests a speeding issue in this location. Features should be considered which would naturally slow down vehicles to 30mph or below.

Visibility splays are required for pedestrian crossings and any physical barriers to the splay (e.g. trees, parked cars) should be highlighted.

A Stage One Road Safety Audit & Designer's Response will be required for any proposals affecting the highway or those proposed for adoption.

Tracking is proposed to be provided in the Transport Assessment to demonstrate that a refuse vehicle is able to access and egress the site in a forward gear. The largest refuse vehicle used within Kent is 11.3m so this vehicle should be tracked.

Parking

Paragraphs 3.21 and 3.22 state *“Following the on-site observations which indicate an existing issue of unlawful and inconsiderate parking, and its subsequent impact on the local highway network, it is proposed that parking will be made available within the proposal site close to the site frontage, which could be used by those dropping off/picking up at the local schools and as potential overflow parking for those using the local facilities on Camer Parade. This measure could offer positive benefits for future and existing residents, motorists, and shop owners in the local area, providing a safer and more convenient access to local facilities. We welcome further discussions with KCC on this matter to determine a suitable provision.”* No proposals have been shown for a car park, nor vehicle, cycle and pedestrian access to it. A balance needs to be struck between providing enough parking for the school to cater for a reasonable demand, but not over providing as this could encourage local trips to be made by private car. It is also considered that given the short distance between the site and the school & Camer Parade, residents should be encouraged to walk and cycle.

Trip Generation

The TRICS assessment shows that the development is predicted to generate approximately 179 two way trips in the AM peak and 181 two-way trips during the PM peak. This level of trips is considered reasonable.

Traffic distribution has been based on the 2011 Census data. However, patterns may have changed post Covid and therefore the Transport Assessment should include a comparison between the 2011 and 2021 datasets (and/or other evidence) to support any assumptions. The distribution is, however, likely to be undertaken by the Kent Transport Model (KTM), referenced below.

Junction Capacity Assessment

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 also needs to be considered in line with other emerging sites.

Traffic modelling should therefore be undertaken using the KTM (or the closely associated Gravesham Transport Model), then, using the outputs, be followed by local junction modelling for junctions which are likely to be over capacity in the ‘with development’ scenario. Further details regarding use of the Kent Transport Model / Gravesham Transport Model can be found here:

<https://www.kent.gov.uk/environment-waste-and-planning/planning-and-land/kent-strategic-model-service>.

The vehicular site access junctions should also be assessed for capacity using appropriate modelling software.

Please include turning movement diagrams for each modelled scenario and the diagrams showing the geometry of the junctions used in the local junction models.

Traffic surveys will be required to enhance the KTM and for local junction modelling. The extent of this study area can be determined during scoping for the Kent Transport Model. Counts should be undertaken in a neutral period e.g. outside of the school holidays. It may be beneficial to discuss the commissioning of junction counts with landowners of other sites in the area that may come forward; KCC are happy to facilitate contact if this would be helpful.

The development should assess a future year of 2039, in line with the developing Gravesham Local Plan.

Parking Provision

Parking provision is not referred to in the Scoping Note, other than in the policy section. Whilst the application will be Outline, the principles of the site with regard to parking should be set out in the Transport Assessment.

Cycle parking should be provided to a high standard, with high quality shelters and be located within appropriate places that promotes this use. Cyclists should not be made to dismount until they reach the parking area. Communal cycle parking should include a proportion (approx. 5%) of spaces designed for adapted bikes, which require 1.5m width between stands for dismounting. If private parking is to be provided in garages, these should be large enough to wheel a bike past a parked car. If it is to be provided in a store in the garden, an appropriate route should be provided to the highway; residents should not be made to carry bikes through the house.

Travel Plan

A Travel Plan is proposed to be provided with the Application and this is welcomed. Given the rural location of the site, the Travel Plan should incorporate realistic measures that will reduce private car use and encourage sustainable modes. Common measures that have been secured on other sites in Gravesham include a car club (with one years free membership for residents and £50 driving credit to encourage take up), parcel lockers, bike hire and one years free bus travel.

Conclusion

The site is located within a rural area and KCC have concerns regarding it's sustainability. A key focus of the Transport Assessment should be to overcome these concerns.

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.

Meeting Notes

Project Title Wrotham Road / Longfield Road, Meopham
Reference T1
Document Title Wrotham Road / Longfield Road, Meopham - Pre-app Meeting
Date/Time 26/06/25 (10:00-11:30)
Revision

Attendees	Company
Angela Coull (AC)	Kent County Council (KCC)
David Barton (DB)	Kent County Council (KCC)
Gerard Mckinney (GM)	Hub Transport Planning (Hub)
Matt Johnson (MJ)	Hub Transport Planning (Hub)

Land East of Wrotham Road

*Many of the comments apply to Land South of Longfield Road including the need to run the proposals through the KTM/GTM traffic model.

Topic	Person	Notes	Action
General	AC/GM	Given the pre-app responses for both developments are similar, both sites can be covered as part of the meeting. As two pre-app fees have been paid, anything that is not covered or if discussion of further information is necessary, this can be done so in another meeting at no extra charge.	
	AC	Main focus of the proposals should be to undertake a vision led approach as opposed to a predict and provide approach as specified within the new NPPF.	
	GM	Asked KCC for preference on parking standards to use as part of the proposals.	
	AC	Gravesham have not formally adopted the new KCC parking standards (2025) and so it would be best to draw on SPG4 which uses the old KCC parking standards.	
	DB	Stated that parking requirements may end up being somewhere in the middle of the two.	
	GM	Stated that Hub will refer to both within the assessment and inform the design team.	Hub

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Active Travel	AC	Refer to LTN 1/20 for walking and cycling design for offsite improvements. Any diversion from that should be justified within the report.	
	AC	It won't be acceptable to acknowledge there are no existing facilities and ignore it.	
	AC	Reference should be made to schemes presented within the Local Cycling and Walking Infrastructure Plan and justify how these could be linked to.	
	GM	Stated that a review will be undertaken to determine how these can either be linked to, or whether contributions could be made towards their implementation.	Hub
	AC	Stated that it is recommended to speak to other developers/consultant for potential developments within the area to create a collective approach to off-site mitigation works. For example, proportionate contributions towards public transport services, walking and cycling infrastructure etc.	
	AC	Iterated that KCC are unable to share the nature of other proposals within the pre-app meeting without permission from applicants.	
Public Transport Strategy	AC	Stated that KCC can provide details of those applicants/consultants subject to permission from both applicants given the confidential nature of the pre-application process.	KCC
	GM	Accepted that Hub can engage with external consultants subject to permission from the applicant.	Hub
	AC	Given the Gravesham Local Plan has not yet gone to consultation, it is believed that, generally, schemes are being progressed prematurely within the area.	
	AC	Mentioned it would be worthwhile having a strategy for public transport that is aligned with other strategies from potential developments within the area to ensure that it collectively serves all without neglecting the needs of others.	
	DB	Questioned whether buses are proposed to route through the site.	
	GM	Stated that they are not given the existing bus stops lie central to serve developments that would be either side of Wrotham	

Meeting Notes

Road. Consideration would be given to potential provision/contributions for service/infrastructure upgrades for public transport.

AC **Reiterated that it would be worthwhile speaking to the KCC public transport team who may be able to assist in speaking to the existing bus operators.** **KCC / Hub**

AC/DB **Stated that that it could be more desirable for people to drive to stations further afield if they offer services to more destinations than Meopham (i.e. Sole Street or Ebbsfleet). This should be explored within the assessment.** **Hub**

GM Indicated that the route to Meopham Station provided footways whilst the route to Sole St provides footways for part of the route.

Parking

AC Asked for information on on-site cycle parking for dwellings and where this will be located. Must be accessible and residents should not have to bring cycles in/store within their house.

GM **Stated that further information will be provided within the TA.** **Hub**

GM Asked KCC for their thoughts on on-site parking provision for shoppers on The Parade and local schools.

AC Stated that the proposals should be trying to encourage less people to drive and more people to walk and cycle. Providing parking could encourage people to drive.

GM Indicated that we would expect future residents of the proposals to walk, and that this was requested by the Parish Councils to offset existing demand.

DB Stated that in general, school pick-up/drop-off is for a limited period of time and is going to happen regardless of provision.

AC Questioned where the proposed parking would be.

GM For land east of Wrotham Road, this would be accessible via the site access and provided behind the frontage.

GM The principal of the development is to create a visual link to The Parade to encourage walking and cycling.

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	AC	Pleased that the design will encourage this but requested that the infrastructure proposals align with the framework plan.	Hub/Client Team
Public Rights of Way	AC	Contact should be made with the PRow team to understand their thoughts on the proposals and whether they have any concerns that need to be addressed.	Hub
Access Proposals	GM	In reference to land east of Wrotham Road, requested KCC's thoughts on the access proposals given the proposals are only slightly over the 300-dwelling limit to provide a 'Major Access Road'.	
	AC	Stated it would be acceptable to provide a typical smaller junction radii of 6m.	
	DB	Stated that given land to the east of the site on Wrotham Road may be developed upon, it would be worth retaining the wider road width to future proof the access, should a bus service be required to route through the site in the future.	
	GM	Stated that that given the ecological buffer on the eastern boundary, it is unlikely that future development could take access from the proposed development. However, acknowledged the point of retaining the wider road width to future proof the access.	Hub
	GM	Gradients will be checked against the guidance to ensure the access is acceptable.	Hub
	GM	Explanation on visibility splay calculations will be provided as part of the assessment.	Hub
	GM	Emergency accesses will be designed and provided to KCC.	Hub
	GM	The Road Safety Audit will be undertaken once all comments have been addressed.	Hub
	GM	Questioned whether the Ghost-Island Right Turn Lane needs to be designed in accordance with DMRB given the 30mph speed limit and the urban nature of the area.	
	AC	Argued that the area is more rural than urban and carries large volumes of traffic, including HGVs, despite the 30mph speed	

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		limit. Referred to the fact Wrotham Road links two strategic corridors in the A2 and M20.	
	DB	Added that despite the 30mph speed limit, Wrotham Road is still an A Road and should be designed in accordance with DMRB.	
Transport Model	GM	Asked for further details on the use of the Kent / Gravesham Transport Model.	
	AC	Stated that Jacobs run the model on behalf of KCC. The Local Planning Authorities will take a cordon of the Kent Transport Model (i.e. Gravesham).	
	AC	Initial contact should be made with the KCC modelling team who will be able to organise a meeting to discuss the proposals and timescales.	Hub
	AC	Stated that AC/DB will be included within the meeting to discuss the scope of the assessment.	KCC
Travel Plan Measures	GM	Can look into providing measures such as car clubs, discounted public transport tickets etc.	
	AC	Iterated that it would again be useful to understand what is going on elsewhere to create a joined-up approach.	
	DB	Stated that cycle parking at Meopham Station should be explored. I.e. could more be provided or upgraded?	
	GM	Hub to explore measures to include within the Travel Plan.	Hub

Land South of Longfield Lane

Topic	Person	Notes	Action
Parking	GM	Requested KCC's thoughts on on-site parking for the local schools at Land South of Longfield Road. Stated that parking would be accessible via the site access and situated adjacent the boundary with the school.	
	DB	May be more beneficial for this proposal, however stated it would be worthwhile understanding how many people drive to the Helen Allison School given the unique requirements disabled children have (i.e. they may need to travel via car/coach compared to other children). This would be more	

Meeting Notes

suitable than simply providing additional parking for general use.

Access
Proposals

AC

In reference to land south of Longfield Road, stated that consideration should be given to the speeds on Longfield Road given the access is situated within a more rural location.

GM

Explained that potential measures including moving of the 30mph speed limit and potential gateway features will be proposed to bring speeds down on approach to the access/Meopham.

Hub

Appendix B

Interim TA Responses



Gravesham Borough Council
Civic Centre
Windmill Street
Gravesend
Kent
DA12 1AU

Highways and Transportation
Kroner House
Eurogate Business Park
Ashford
TN24 8XU
Tel: 03000 418181
Date: 3 December 2025
Our Ref: AC

Application -	GB/20250992
Location -	Land At, Wrotham Road, Meopham, Gravesend Kent
Proposal -	Outline application for the erection of up to 350 residential dwellings, public open space and associated works. Approval is sought for the principal means of vehicular access from Wrotham Road and all other matters are reserved.

Thank you for your consultation in relation to the above planning application. I have the following comments to make with respect to highway matters:

Summary

Kent County Council Highways (KCC) has significant concerns regarding the sustainability and transport impacts of the proposed development of approximately 350 dwellings east of Wrotham Road, Meopham. While the site is close to some local facilities, key issues include:

- **Sustainability:** Limited public transport provision, inadequate walking and cycling infrastructure, and insufficient measures to support modal shift away from private car use.
- **Access and Safety:** Existing speeds exceed limits; proposed access arrangements raise safety concerns and require further review.
- **Public Transport:** Bus services are infrequent and lack peak-time commuter options.
- **Walking and Cycling:** Deficiencies in local infrastructure, including lighting, cycle routes, and accessibility features.
- **Policy Compliance:** The application conflicts with NPPF requirements for sustainable transport and Gravesham Design Code principles.
- **Further Information Required:** Details on emergency access, visibility splays, off-site improvements, financial contributions, and modelling results.

Existing Access to the Site

Access to the site is proposed to be taken from the A227 Wrotham Road, a strategic route connecting to the A2 in the north and the M20 in the south. The A227 is likely to accommodate a relatively significant number of HGVs, although the applicant should confirm the percentage from the survey data. Speed surveys indicate 85th percentile speeds exceed the 30 mph limit. Sections between Longfield Road and Meopham Station lack street lighting, and footway widths vary, with some narrow sections. Cyclists currently share the carriageway with motor vehicles, which is likely acceptable only to confident riders. This is evident in the Census data provided in the Travel Plan, which shows only 1% of people in the area currently cycle to work.

Access to Key Destinations

Table 8 of the Transport Assessment (TA) identifies walking distances to local facilities, including Meopham Community Academy at 350m from the site. Whilst the school is within an acceptable walking distance, its capacity for additional pupils is uncertain and should be clarified. If places are unavailable, residents may need to travel outside Meopham, likely by car due to limited cycling infrastructure and bus provision. Similar concerns apply to the medical centre and dentist. No supermarkets are listed, and weekly shopping at a convenience store is unlikely.

One of the key destinations for new residents is likely to be Meopham Station. Due to the lack of cycle infrastructure on the A227, the applicant proposes to direct cyclists to Tradescant Drive and Norwood Lane. The suitability of this route is questionable given that it is a 200m diversion from the A227, is not lit, and includes a PROW (public footpath) that prohibits cycle access. Requiring cyclists to dismount would be impractical and discriminatory, particularly for disabled cyclists who may struggle to do this. It is therefore likely that residents would want to stay on the direct route which is via the A227 and therefore cycle facilities should be provided. There is also a lack of cycle facilities and lighting on the A227 between the site and the secondary school.

Routes for pedestrians and cyclists should be direct, well-lit, and overlooked. While this may be achievable within the site, off-site routes, lack sufficient infrastructure.

Walking and Cycling

A walking and cycling audit of the local area (Table 9 of the TA) highlights deficiencies such as an absence of cycle routes, inadequate lighting, cycle parking, wayfinding, shelter, rest areas, tactile paving at crossings and step-free access at Meopham Station, as well as inconsistent footway widths and surfacing. It does not reference the absence of cycle facilities at the convenience store (or the presence of steps) or the lack of footway on approach to the station car park (shown in 'View 14' in Appendix C). Proposed improvements include a 3m shared pedestrian/cycle route along the site boundary, uncontrolled crossings with refuges, footway widening, vegetation clearance, and financial contributions towards cycle parking at Meopham Station and Local Cycling and Walking Implementation Plan (LCWIP) Route 6. However, most measures focus on Route 1 (Green Lane to Longfield Road). Additional improvements, particularly a cycle route and lighting to Meopham Station, are required. Cycle parking should also be provided at Camer Parade.

Bus Stops and Services

Existing bus stops are located within walking distance of the site but only serve three routes. Service 306 is believed to be a school service operating at full capacity. Services 308 (Sevenoaks) and 416 (Meopham) have limited frequency Monday to Saturday and no Sunday service. There is no commuter service during the AM peak and only one PM peak service at 17:36. Without enhancement, residents will have limited access to wider transport connections. Service 308 currently requires subsidy, indicating commercial unsustainability. The existing level of provision is inadequate for a development of this scale and must be improved. KCC seeks further discussion on this enhancement, in coordination with other sites coming forward.

Proposed Access

Five pedestrian and cycle access points are proposed to be provided from the site (four on to the A227 including the emergency access, and one on to Green Lane). This level of permeability is welcomed. Vehicle access will be via a priority junction with a right-turn bay. The access proposals and proposed improvements to the A227 are shown on plan 'Proposed Site Access with Visibility Splays' Ref 001 Rev F. There are a number of issues that the proposals raise, and these are as follows:

- The site access junction is located within close proximity of existing driveways, which is concerning, particularly the driveway that appears to be located directly opposite the exit arm of the proposed access. This creates a direct conflict, particularly as the driver exiting the driveway will also be blocked by drivers in the right turn bay. The right turn bay could hold approximately 6 vehicles, which could cause significant delay to the existing residents waiting to emerge from the driveway. This may result in the residents trying to push their way through - not only causing potential conflicts with other vehicles in the right turn bay, but also being obscured from view from A227 northbound traffic by a vehicle in the right turn bay. This could result in collisions. Consideration should be given to relocating the vehicle access towards the southern end of the site.
- A continuous crossing is proposed across the site access bell mouth. However, the modelling results show there is significant delay (60 seconds) to the site access arm which could result in drivers sitting on the footway trying to force their way out / seeking gaps. The continuous footway is therefore unlikely to be appropriate in this particular location.
- The start of the hatching for the new right turn bay is very close to the Camer Parade exit. The modelling results show that there is likely to be a queue of one vehicle on Wrotham Road. Could the bay therefore be shortened slightly? The amendments would still need to meet the DMRB standard. The proposed hatching in this area is likely to be frequently over run and will wear away quickly.
- The pedestrian and cycle link to Green Lane in the north, referred to in the Design and Access Statement is not shown. As access is not a reserved matter, all pedestrian and cycle access points must be shown.
- The shared cycle facilities along the site boundary fronting the A227 Wrotham Road are welcome. However, please could the applicant confirm why this cannot be a segregated cycle route, for example, cyclists at carriageway level but segregated from the road with a kerbed edge?
- The amendment to the uncontrolled crossing point south of Longfield Road is acceptable in principle. However, it is questioned whether this reduced waiting area would cater for the demand during school drop off and pick up, and also whether this design has been considered in the context of the illegal parking which occurs on the A227 during school drop off and pick up. Consideration should be given to having the crossing area at carriageway level, while retaining the kerbed edge on the outer edge of the refuge.
- The provision of a new crossing point between the site and Camer Parade is welcomed. However, this should also accommodate cyclists. Have alternative crossing types been considered e.g. toucan crossing? This would provide a safer crossing, would remove the need for a refuge and could assist in naturally enforcing the 30mph speed limit. The A227 would need to have street lighting in order to meet standards.
- The 2m wide island running north / south parallel to Camer Parade is too close to the bus stop. Whilst tracking shows a car can pass a stationary bus, it is questioned whether a HGV could also make this manoeuvre.
- The available widths across the A227 are questioned as the dimensions conflict with those associated with the recent KCC scheme undertaken in this area. This needs to be reviewed.
- The removal of a parking bay is not ideal given the demand for parking in this area. However, if it allows for the provision of a safe crossing point then this may be acceptable. Any spaces removed from the shopping area should be re-provided within the site, within proximity to the new crossing, as suggested by the applicant.
- The proposed bus shelter is located where the back of the bus would be positioned, which could lead to the bus blocking the Camer Parade entrance. This should be relocated.
- An amended uncontrolled crossing is shown across the junction with Green Lane, but when crossing south to north, visibility is poor. Green Lane is signed as 'Not Suitable for

Heavy Goods Vehicles'. Has consideration therefore been given to narrowing the bell mouth (ensuring refuse vehicles still have appropriate access) and pulling the crossing further forward, reducing the crossing width and increasing visibility?

- It is unclear why the emergency access (south of Longfield Road) requires such a large bell mouth. This takes pedestrians and cyclists significantly away from the desire line. As this access would only be used in an emergency, it is questioned why this would not be a crossover. The transition to allow cyclists to enter / leave the shared route, is welcomed.
- It is unclear why cyclists travelling northbound would need to exit the carriageway south of Longfield Road, to cross over the A227, when they could enter the shared route further south (near the emergency access).
- For sites over 300 units, a secondary access is usually required but has not been provided. Justification for this omission is required.
- Paragraph 6.31 of the TA states "Visibility splays from the access junction are provided within Drawing T25512.001 Rev F". However, these are not shown on the plan. Visibility splays for the access points (including where pedestrian routes emerge onto a cycle route) and all proposed crossings (forward visibility and visibility for pedestrians/cyclists) must be provided so they can be reviewed and conditioned to any permission granted.

The applicant must reinstate any kerbs where changes have been made e.g. on the islands. It is assumed that no highway trees would be removed for the proposals but please can the applicant confirm? KCC do not usually permit the removal of existing healthy trees.

The vehicle tracking shown on plans T25512.002 Rev E, T25512.003 and T25512.002.01 Rev A will need to be re-run following removal of the continuous crossing at the access.

A Road Safety Audit was undertaken and the Designer's Response confirms that all recommendations have been addressed.

Cycle and Vehicle Parking

Cycle parking will be provided on a one-per-bedroom basis, which is supported. Garden stores must allow direct access to the highway, and garages must be of a sufficient size to accommodate both a vehicle and a cycle. Ideally, cycle parking would be located at the front of the unit. Communal parking should include spaces for adapted bikes (approximately 5%), electric bike charging, and visitor parking.

Paragraph 4.25 of the TA relates to engagement with the Parish Council and states "Concerns were raised regarding local traffic and parking issues associated within the school pick-up and drop-off periods on local roads, as well as on Camer Parade." A parking assessment of the existing local highway was undertaken by the applicant and confirms that "Across the school drop-off and pick-up periods, parking on the local road network and parking areas increases closer to the school start/finish times before dropping back to a 'typical' level". As a result, the applicant proposes to provide some parking bays within the site which would either be solely allocated to facilities on Camer Parade or unallocated parking for general use. As the site is well within walking distance of the school and Camer Parade, new residents are unlikely to add to this on-street issue. Providing additional parking for these facilities is therefore not required to make the proposal acceptable in planning, and could have a negative impact by encouraging more car-based trips to the area at a time when policy requires encouragement of walking and cycling to local facilities. However, should any parking bays need to be removed at Camer Parade to enable delivery of a safe crossing, these could be re-provided within the site, adjacent to the crossing. Information related to how these spaces would be signed and managed is required.

Trip Generation and Junction Capacity Modelling

The development is anticipated to generate 179 two-way trips in the AM peak and 182 two-way trips in the PM peak. This is reasonable. However, strategic highway modelling has not yet been

completed, preventing KCC from forming an opinion on the highway impact of the site, including the cumulative impacts with other Local Plan sites coming forward ahead of the Regulation 19 Local Plan consultation.

The traffic surveys showed the peak hours on the network are 08:00-0900 and 15:00-16:00. However, as the flows are similar to the typical PM peak hour (both of the network and the site - 17:00-18:00) the applicant proposes to assess the typical peak hour. The flow differences between the current and assessed PM peak hours should be set out within the forthcoming TA Addendum to justify this approach.

Initial local junction capacity modelling has been undertaken, although this will be updated following the results of the strategic modelling. Table 17 of the TA shows initial queue results for the A227 Wrotham Road / Longfield Road junction. The modelled queues are lower than the observed queues and this should be investigated prior to them being re-run in order to ensure the model is representative of existing conditions.

Table 18 shows the modelling results for the A227 Wrotham Road / Site Access junction. The results show the junction is anticipated to operate well within capacity during the peak hours, although it is noted that the delay to the site access arm is 60 seconds in the AM peak. This is a significant delay and there is concern that this would encourage drivers to pull out without waiting for a reasonable gap in traffic.

Table 19 shows the initial modelling results for the A227 Wrotham Road / Longfield Road junction. The results show the junction currently operates within capacity in both peak periods but is anticipated to operate above capacity in the '2030 Base' AM peak scenario onwards, as well as in the 2039 'With Development' PM peak scenario. Mitigation is likely to be required for this junction. The modelling outputs for this junction are not included in the appendices for review and should be included in the forthcoming TA Addendum.

Travel Plan

The Travel Plan (TP) aims for a limited target of 5% reduction in car trips, which reinforces KCC concerns regarding sustainability.

Sustainable measures proposed to be provided include: a Car Club (including one year's free membership for residents and driving credit), public transport seasons tickets (although it does not state how long the season ticket would cover), parcel lockers, public transport timetable and route information, and active travel events and promotion. These measures are supported.

The Travel Plan review should include information on the uptake of the public transport tickets and use of the car club.

With regard to the Action Plan at Table 6 of the TP, the timescale for the monitoring report should be "Within three months of the travel surveys being undertaken".

The contact details of the Travel Plan Coordinator should be sent to KCC (along with the planning application reference number) once they have been appointed: travelplans@kent.gov.uk.

Policy

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.

The Design for Gravesham Design Code, 2024 (Supplementary Planning Document) is not referenced in the TA. However, it provides confirmation that development in rural areas require appropriate sustainable infrastructure. Section 3.11 relates to the “Future for the rural areas?” and states “a. 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 “b. Improved pedestrian and cycling permeability throughout each village”.

A predict-and-provide approach has been undertaken rather than a vision-and-validate approach. This is contrary to policy. However, the proposals do provide a number of active travel measures to achieve a modal shift away from the private car.

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, both internal and external to the site), 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 between the site and the station, 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 such as Meopham Station, 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.

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.



Active
Travel
England

Active Travel England
West Offices
Station Rise
York
YO1 6GA
Tel: 0300 330 3000

Your Ref: 20250992
Our Ref: ATE/25/01695/OUT
Date: 03 December 2025

Active Travel England Planning Response Detailed Response to an Application for Planning Permission

From: Planning & Development Division, Active Travel England

To: Gravesham Borough Council

Application Ref: 20250992

Site Address: Land At Wrotham Road Meopham Gravesend, Kent, DA13
0AA

Description of development: Outline application for the erection of up to 350 residential dwellings, public open space and associated works. Approval is sought for the principal means of vehicular access from Wrotham Road and all other matters are reserved.

Notice is hereby given that Active Travel England's formal recommendation is as follows:

Deferral: ATE is not currently in a position to support this application and requests further assessment, evidence, revisions and/or dialogue as set out in this response.

Background and summary

ATE welcomes the opportunity to comment on this application, an outline application for 350 homes near Wrotham Road, Meopham, Kent.

Trip generation assignment and mode shares

The Transport Assessment has not forecasted the level of trips by all modes likely to be associated with the development, as required by National Planning Policy guidance on Travel Plans, Transport Assessments and Statements. This does not represent a sound basis upon which to forecast the needs for active and sustainable travel, nor does it demonstrate a commitment to improving and enhancing active travel networks that serve the site. ATE therefore expects the applicant to present a multi-modal trip generation analysis of all modes of transport throughout the day, rather than the analysis being confined to peak hour periods.

ATE supports the use of the TRICS methodology. 2011 Census data is considered both outdated and unsuitable due to its focus on commuting journeys and exclusion of other types of trips.

ATE considers the provided route audit to be detailed, although invites the applicant to further consider the shortfalls and what can be done to address these alongside

consultation with KCC Highways.) The audit would benefit from including the area around the station. ATE would question some of the scoring given to cycling routes in particular, which operate with the assumption that the carriageway is safe and acceptable for cycling. Given the high traffic numbers, ATE does not support this and would welcome the LHA opinion on this aspect.

ATE would expect to see a more ambitious AT uplift target as part of the travel plan, considering the surrounding amenities, schools, shops and train station, and to consider what opportunities are present to maximise travel by these modes. Additionally, the travel plan should include action to be taken if the targets are not met. The proposed sustainable transport initiatives are supported.

Off site infrastructure

Walking

Due to the traffic volumes of the A227 exceeding 10,000 vehicles per day (DfT, 2024), an 85th percentile speed over 30mph, and its "strategic function" connecting the A2 and M20/M26, ATE would suggest that a signalised crossing be considered. This is understood to be supported by KCC highways. This would be most appropriate between the site and Camer Parade to serve people using the shops. ATE supports the approach from KCC Highways of providing a smaller 6m radius junction as opposed to a larger 6.5m radius junction, as the reduced crossing distance and therefore vehicle speeds are less hostile to active travel. Local amenities are good, with a primary school, shop and local businesses being located under 200m from the site entrance. Some other amenities are located further than the 800m recommended maximum walking distance outlined in the National Design Guide (2021) including a doctor's surgery (1.1km), secondary school (1.2km) and Meopham train station (1.2km). The latter is particularly important to enable multimodal journeys. The nearest large supermarket is over 5km away, which is disappointing. ATE would like to reiterate that if the distance to key amenities is greater than 800m it is even more important that the route is of high quality. In any case the route should be accessible to all users with:

- a minimum width of 2m with no clutter
 - continuous pavement or dropped kerbs at side roads
 - be made of a smooth, continuous and sealed surface throughout with no steps
 - good lighting, wayfinding, sightlines
 - crossing points where appropriate (consider controlled crossings due to traffic volumes)
- ATE would like to remind the applicant that the above standards include PRowS. This should be agreed with KCC's PRowS department.

Cycling

ATE does not consider the proposed 3.0m shared use paths LTN 1/20 compliant and notes the applicant appears to have the space to separate pedestrians and cyclists which should be considered. This is particularly important given the use of the route by families and children to access the nearby schools. ATE notes the intention to use Tradescant Drive and Norwood Lane as an alternative cycle route to Meopham station from the north of the site. ATE does not consider this to be acceptable due to the following:

- The route is not direct or intuitive for cyclists to follow
- Norwood Lane represents a major concern due to its narrow width, poor visibility and lack of lighting.
- The narrow alleyway presents a safety concern, both physically due to the narrow width for bikes to pass and for perceived safety. LTN 1/20 does not permit the use of access controls which require cyclists to dismount, as they are not inclusive and restrict the use of the route for disabled cyclists who cannot dismount, as well as cargo bikes and other non-

standard cycles. The path would additionally require reclassifying. This approach does not appear to be supported by the LHA and is not supported by ATE.

ATE would encourage the applicant to consider all possible options for cycle infrastructure on Wrotham Road in order to deliver cycle infrastructure that is safe, coherent, attractive, direct and comfortable as per LTN 1/20, and reiterates that cyclists should not be expected or encouraged to cycle in mixed traffic on Wrotham Road (A227.) This approach is supported by KCC Highways. The side road adjacent to St Pauls Church could also be used. Provision for cycles south of the site should be investigated at least as far as Meopham school, in order to provide cyclists with a choice of route and avoid forcing cyclists to use the carriageway.

Public Transport

ATE supports the approach taken by the applicant to focus efforts on improving bus service on Wrotham Road and supports the improvement of bus stops to add shelters and real time information. ATE requests this additionally be supplemented with seating (unless this is included as part of the shelter) in order to comply with LTN 1/24 Bus User Priority (6.10, p49-50) ATE requests to be notified of the results of engagement with KCC Public Transport and the bus operators, and seeks commitments which should be secured by an appropriate condition at this stage. ATE maintains the belief that improved bus service, particularly to Gravesend, would be a welcome intervention to reduce car usage and traffic. Discussions with Southeastern around the potential provision of step free access at Meopham station (which currently has none for trains away from London) would be welcomed. Additionally, discussions regarding service frequency or alterations would additionally be worthwhile, particularly regarding peak time services to improve the attractiveness of walking or cycling to Meopham station vs driving to Ebbsfleet. Current peak time journeys from Meopham to London Victoria are around 50 minutes, meaning some commuters may decide to drive to Ebbsfleet should the issues identified not be addressed.

Other comments

ATE strongly suggests that the applicant engage with the developers of other nearby proposals, such as Taylor Wimpey's development to the west of Norwood Lane, in order to create an integrated transport strategy and deliver more effective offsite improvements. This represents an opportunity to combine resources to create high-quality active travel infrastructure. The junction with Green Lane would benefit from being redesigned in order to make it easier to cross on foot and keep vehicle speeds low. It is understood this approach is supported by KCC Highways. It is also worth considering whether the junction with Longfield Road could be altered to reduce vehicle speeds. ATE supports the proposal for a pedestrian/cycle priority at the site entrance, but requests clarity regarding the design of this. The drawings do not make it clear which sections of the path (if any) are raised. Whilst ATE does not object to this design, it does encourage the applicant to work with the LHA to provide a design which is safe and suitable for all users. The design incorporates aspects of a continuous footway/priority treatment, but it may not be easily interpreted by all road users. Setting this back from the road slightly to allow one car length whilst maintaining AT priority could be beneficial in order to reduce conflicts, and to make the crossing easier to use for drivers. Examples can be seen on LTN 1/20 p106.

Masterplanning and permeability

Whilst this application is at outline stage, ATE considers this the best time to comment on the proposed site layout ahead of progression to reserved matters. ATE views the site access points as acceptable and requests all proposed AT access be safeguarded at this stage. ATE is broadly satisfied with the active travel access layout, however, believes an

additional connection across the middle of the site (east-west) would dramatically improve site permeability and allow the active travel potential to be fully realised. This could be achieved through a new path, or a modal filter on one of the residential streets. ATE does not consider a 3m wide shared use path as LTN 1/20 compliant and asks the applicant whether it is possible to separate pedestrians and cyclists. This is most pressing for the A227 and primary access roads. ATE generally does not support mown paths, however, will not object specifically to the path proposed at the very north of the site as equally direct alternative paths are provided. ATE would like to seek a commitment that all other proposed paths are at least 2m wide, well lit, and made of a smooth, sealed surface throughout. Additionally, the final design should consider surveillance, ensuring paths are overlooked. ATE would also question whether the emergency access can be narrowed to provide a more direct and comfortable crossover for pedestrians and cyclists at this location.

ATE supports the proposed 20mph site speed limit but would welcome details on design considerations to achieve this.

On-site facilities

ATE regards the proposed cycle parking provision of one space per bedroom to be acceptable and is in line with KCC's parking standards. However, all cycle parking should be within the building footprint of the house or garage. ATE does not consider sheds or rear gardens to be acceptable cycle parking provision as this introduces unnecessary friction to cycling as a means of transport and invites theft. Additionally, the use of sheds as cycle parking competes with gardening tools, barbeques and other items which make them inappropriate as cycle stores. ATE reminds the applicant of their obligation to "give priority first to pedestrian and cycle movements" (NPPF 117) and providing easily accessible and secure cycle parking, ideally situated at the front of the dwelling, is part of this obligation. ATE requests more details regarding the proposed contributions to cycle parking at Meopham station. This is strongly supported by ATE, and the applicant is encouraged to consider whether secure parking would be feasible. This would need to be discussed with Southeastern Railway, who already operate several secure facilities across their network. ATE would like to be notified of the result of these discussions and any proposals should be committed to as part of the reserved matters and secured by an appropriate condition. ATE recommend the applicant discuss with KCC Highways whether cycle parking can be provided at Camer Parade, as this is likely to be a major trip generator.

Next steps

ATE requests this advice be shared with the LPA case officer, agent and applicant. ATE would be content to review further submitted information to help address the identified defects, with a view to providing a further response and recommended wording for planning conditions and obligations.

Matthew Johnson

From: Bidur Rajbhandari <bidur.rajbhandari@nationalhighways.co.uk>
Sent: 29 April 2026 09:25
To: Matthew Johnson
Cc: Planning SE
Subject: 26816 Planning Ref: GB/20250992 and GB/20250993 (Meopham, Kent)

Dear Matt

Thank for your mail on 8 April 2026 regarding our response to the application with the additional information.

This response is for both applications.

Throughout this response any **ACTION POINTS** for the applicant are shown as **bold underlined**.

Please note that our NHPR had outlined a number of matters that could need to be addressed including:

- Trip Distribution and Assignment
- Transport Vision
- Personal Injury Accident Data
- Committed Development/Schemes
- Assessment Years
- Opening Year
- TEMPRO Growth Factors
- Merge/Diverge Assessment after agreement on trip generation
- CEMP Requirements

Please note we have not taken independent verification of trip generation and as such furthermore the vehicle trip rates and trip generation set out in TA would only be accepted as a 'pre-vision' scenario when this is carried out.

It is important to note that some of the submitted strategic model outputs also include the Land Adjacent to Longfield Road site as part of some of the scenarios presented, which assess the combined impact of the two sites. Strategic Model Outputs

We note that the Kent Transport Model (KTM) has been used to assess the impacts of the two development sites with a total of eight scenarios tested. Outputs from the modelling have been provided in the form of junction turning counts for all scenarios and flow bundles for Scenario 4 only.

Within the modelled scenarios, Land at Wrotham Road is referred to as Site 1, Land Adjacent to Longfield Road is referred to as Site 2.

The junction turning counts have been reviewed for Scenario 4 (2042 Local plan plus Site 1 and 2) and compared back to Scenario 1 (2042 Local plan only). This review has identified a small increase

in traffic at the Wrotham Road / Longfield Road junction and a larger increase in flows at the Wrotham Road / Green Lane junction.

The turning counts have been used to determine the modelled origin and destination trips from each of the two sites.

The flow bundle information appears to only show the trips to and from the two development sites rather than the overall changes to flows on the links shown. The flows shown are generally consistent with the information from the junction turning counts.

As the information in the flow bundles only shows the trips from the development sites, **we would also request to see the change in overall flows for the same study area, of particular interest will be the junctions along the A2, as well as the impacts of the developments on the junction operation (V/C and delay information).**

The junction turning counts suggest that there is re-routing occurring for existing traffic, this is likely in part as a result of the junction being close to or at capacity by 2042.

Notwithstanding the above, based on the flow bundles provided for Scenario 4, the combined trip impact on the SRN is as follows:

A2/Wrotham Road Junction

- AM Peak Hour 92 vehicle trips
- PM Peak Hour 105 vehicle trips

To/From M20

- AM Peak Hour 29 vehicle trips
- PM Peak Hour 34 vehicle trips

We have undertaken an independent high-level analysis to estimate the approximate level of trips which would be expected to impact on the nearest SRN junctions. This independent analysis is important in order to provide a sense check against the analysis presented to NH for review.

For this analysis we have utilised Census 2011 journey to work data for the MSOA area in which the proposed development site is based.

This analysis indicates that the combined impact on the A2/Wrotham Road junction is estimated to be circa:

- AM Peak Hour 152 vehicle trips
- PM Peak Hour 154 vehicle trips

For trips travelling to/from the M20 this is estimated to be circa:

- AM Peak Hour 37 vehicle trips
- PM Peak Hour 37 vehicle trips

Our independent high-level analysis has identified a significant difference in the predicted impact at the A2/Wrotham Road junction.

We note that the KTM model also shows a greater impact at A2/Henhurst Road and A2/Halfpence Lane Junction.

Given the above, we would request a copy of the modelling brief to be provided to understand the methodology utilised to distribute and assign traffic within the strategic model, in addition to the forecast model reports.

SRN Capacity Assessment

We note the intention to complete further local junction modelling including the A2/Wrotham Road junction.

However, we will only be able to advise on the need for, and scope of SRN modelling required once the proposed development trip distribution and assignment is agreed. **Any local junction modelling of SRN junctions will need to be undertaken in accordance with the guidance set out in DfT Circular 01/2022.**

A2/Wrotham Road Junction

It is important to note that the A2/Wrotham Road junction is currently operating under congested conditions during the evening peak hour with queuing traffic on the A2 westbound off slip.

We are aware of two committed mitigation schemes for the southern roundabout at this junction.

The longer-term scheme is signalisation, and the short-term scheme is modification of lane markings associated with the off-slip.

These schemes are shown indicatively on the following drawing numbers:

- 'Interim Mitigation Scheme' Drawing Number: 22052-MA-XX-DR-C-0102 P07
- 'Final Mitigation Scheme' Drawing number: 684437CH-JAC-A2-HGN-DR-1200-001 Rev P01 (Jacobs, August 2020)

Consented planning applications which have assessed and are committed to delivering these schemes:

- Former Tollgate Hotel, Gravesend (LPA reference 20240856) – 'Interim mitigation scheme'
- Land at Coldharbour Road (LPA reference 20141214) – 'Final mitigation scheme'

Assessment of this SRN junction will be required and this should be based on a calibrated and validated base year model.

Furthermore, any assessments should include these committed schemes within the relevant scenarios and be compliant with the guidance set out in DfT Circular 01/2022.

We would therefore recommend that once the full extent of SRN assessment has been agreed, the applicant should seek an up-to-date list of committed developments and details of committed schemes from the LPA.

Collision Data Analysis

This will be required for any SRN junctions which require capacity analysis and this will be determined once there is an agreed trip distribution and assignment.

We hope this is of assistance to you.

Should you or any others have any queries regarding our response, please contact us via planningse@nationalhighways.co.uk.

Kind regards,

Bidur Rajbhandari, Assistant Spatial Planner
South East Region, Operations Directorate
National Highways

Office: 0300 470 1563
Mobile: 07710 286 166

Web: www.nationalhighways.co.uk

For information about our engagement with the planning system please visit
<https://nationalhighways.co.uk/our-roads/planning-and-the-strategic-road-network-in-england/>

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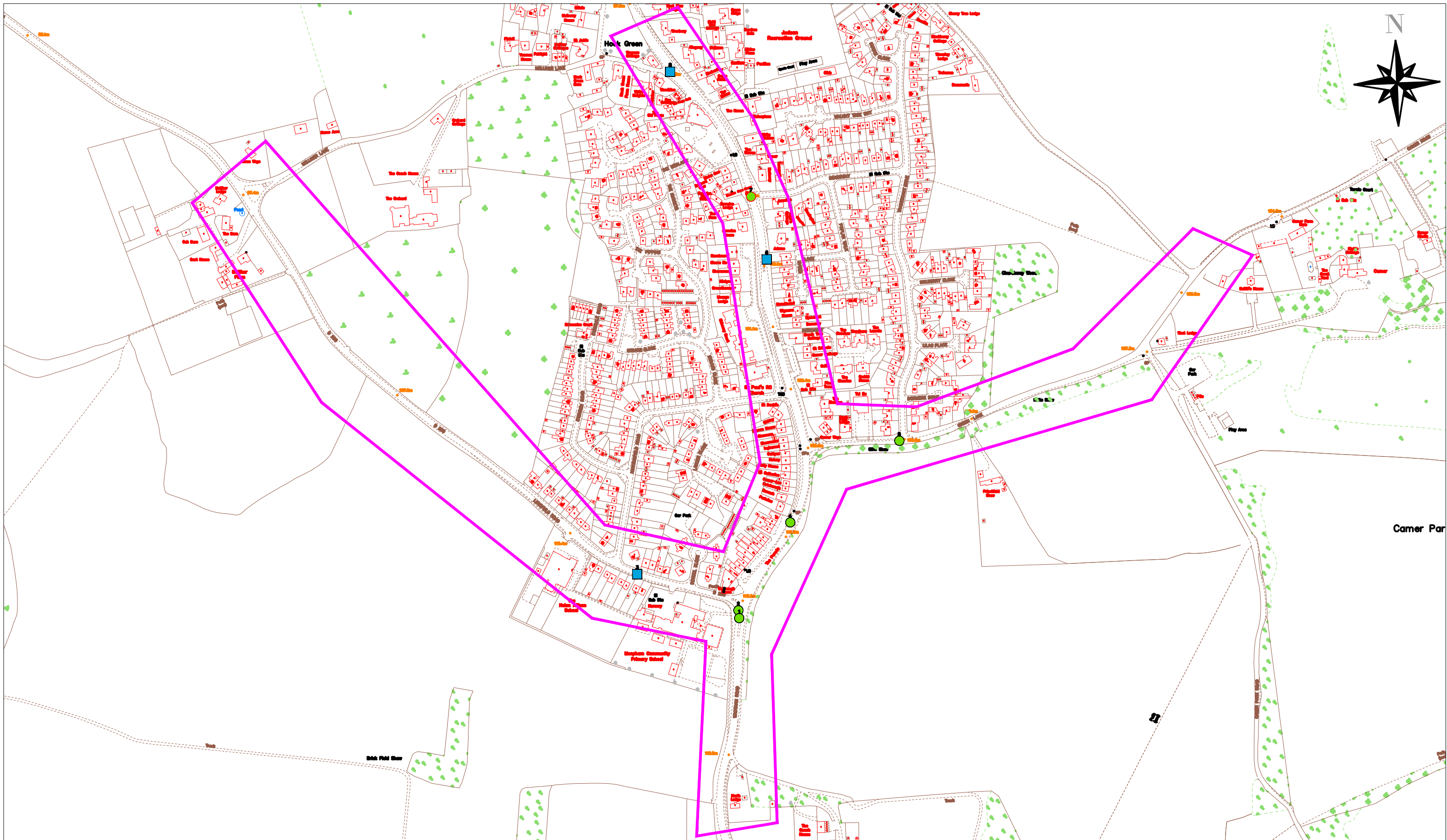
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<https://nationalhighways.co.uk> | info@nationalhighways.co.uk

Registered in England and Wales no 9346363 | Registered Office: Three Snowhill, Snowhill Queensway, Birmingham, B4 6GA

Consider the environment. Please don't print this e-mail unless you really need to.

Appendix C

Personal Injury Accident Data



Location: Meopham

5 years personal injury collision data up to 31/12/2025

KCC Ref number: EXT/112/26

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Crash Severity	
	Slight
	Serious
	Fatal



Kent
County
Council
kent.gov.uk

Date: 27-May-2026

Time: 15:49:22

Title: **Meopham**

Requested output: **D - Print Crash Report**

Date: 27-May-2026

Accident Date BETWEEN '01-Jan-2021' AND '31-Dec-2025'

There were 8 reported crashes resulting in injury

D-PRINT CRASH REPORT

27-May-2026
15:49:22

Meopham

Accident Date BETWEEN '01-Jan-2021' AND '31-Dec-2025'

No	Location	Severity	Date	Day	Time	Street Lighting	Road Surface	Weather	Pedestrian Direction	Factors	Involved
1	Road No A227 Grid 564393E Section 142 Ref 166651N	SLIGHT	27/09/2023	4	07:49	L	Dry	Fine		S.VEH	
	A227 WROTHAM ROAD PED RAILINGS NEAR J/W B260 LONGFIELD ROAD, MEOPHAM								Gravesham		
	BASED ON DRIVERS ACCOUNT AT THE SCENE, THEY STATED THAT WHEN DRIVING THEY HIT SOMETHING WITH THE LEFT HAND SIDE OF CAR CAUSING THEM TO CORRECT. HOWEVER THEY OVERCORRECTED AND OVERTURNED (WHEELS) WHICH CAUSED THEM TO DRIVE UP INTO PEDESTRIAN CENTRAL CROSSING, WITH THE RAILINGS GOING THROUGH THEIR BONNET.						Veh1, car, S -> N			Casualties 2 Vehicles 1	
2	Road No A227 Grid 564392E Section 142 Ref 166661N	SLIGHT	01/11/2024	6	22:05	DRK STL	Dry	Fine Wind			
	A227 WROTHAM RD J/W B260 LONGFIELD RD, MEOPHAM								Gravesham		
	OLR: V2 stationary at temporary traffic lights at junction when it was struck from behind by V1. V1 failed to stop.						Veh1, car, S -> NE Veh2, car, S -> NE			Casualties 1 Vehicles 2	
3	Road No B260 Grid 564263E Section 070 Ref 166707N	SERIOUS	25/10/2023	4	19:32	DRK STL	Dry	Fine			GV
	B260, LONGFIELD RD J/W HUNTINGFIELD RD, MEOPHAM,								Gravesham		
	V1 HAS PULLED OUT OF JUNCTION FROM HUNTINGFIELD RD TO LONGFIELD RD AND HAS COLLIDED FRONT ON WITH V2. V1 HAS SPUN AND LANDED OUTSIDE OF NO 7 WHILST V2 HAS SPUN AND MOUNTED THE KERB.						Veh1, goods < 3.5t, NE -> SW Veh2, car, SE -> NW			Casualties 1 Vehicles 2	

Key Involved

PED Pedestrian
HGV Heavy Goods Vehicle
GV Goods Vehicle
M/C Motor Cycle
P/C Pedal Cycle
PSV Bus/Coach

Street Lighting

L Daylight
STL Street Lights
USL Street Lights Unlit
NSL No Street Lights
STU Street Lights Unknown

FACTORS

+VE Positive Breath Test
R.TURN Right Turn Manoeuvre
O/TAKE Overtaking Manoeuvre
S.VEH Single Vehicle

Special Conditions

ATS OUT Traffic Lights Not Working
ATS DEF Traffic Lights Defective
SIGNS Road Signs Defective or Obscured
RD WRKS Road Works
Surface Road Surface Defective

D-PRINT CRASH REPORT

27-May-2026

15:49:22

Meopham

Accident Date BETWEEN '01-Jan-2021' AND '31-Dec-2025'

No	Location	Severity	Date	Day	Time	Street Lighting	Road Surface	Weather	Pedestrian Direction	Factors	Involved
4	Road No U Section 179 Grid 564458E Ref 166773N	SLIGHT	08/05/2025	5	07:50	L	Dry	Fine		R.TURN	M/C
	WROTHAM RD J/W A227 WROTHAM RD, MEOPHAM								Gravesham		
	V2 has pulled out of the junction wanting to turn right onto the A227 Wrotham Rd and into the path of V1 who was unable to avoid collision.						Veh1, m/cycle 50 - 125cc, SW -> NE Veh2, car, NW -> SW			Casualties Vehicles	1 2
5	Road No C492 Section 002 Grid 564597E Ref 166877N	SLIGHT	02/02/2023	5	15:30	L	Dry	Fine		R.TURN	
	C492, GREEN LANE J/W TRADESCANT DRIVE, MEOPHAM.								Gravesham		
	V1 and V2 were travelling in opposite directions along Green Lane towards the junction at Tradescant Drive. V3 was waiting at this junction to pull out onto Green Lane. The junction is on V2's offside. V1 has moved to the nearside following other traffic. D1 has gone wider than appropriate and collided with V2. V1 has then spun clockwise and collided with their back offside with V3 front nearside.						Veh1, car, W -> NE Veh2, car, NE -> W Veh3, car, N -> W			Casualties Vehicles	2 3
6	Road No A227 Section 147 Grid 564428E Ref 167108N	SERIOUS	03/03/2025	2	11:58	L	Dry	Fine			P/C
	A227 WROTHAM RD, MEOPHAM (MAPPED TO DESCRIPTION)								Gravesham		
	V2, is a vehicle towing a trailer, which was travelling S on the main carriageway. R2/pedal cycle stated that whilst riding V1, they pulled out from a layby/bus stop in Wrotham Rd, in the same direction, when they collided with the n/s of the trailer of V2 resulting in being knocked off V1. No VRMS or postcodes given.						Veh1, pedal cycle, N -> S Veh2, car, N -> S			Casualties Vehicles	1 2

Key Involved

PED Pedestrian
HGV Heavy Goods Vehicle
GV Goods Vehicle
M/C Motor Cycle
P/C Pedal Cycle
PSV Bus/Coach

Street Lighting

L Daylight
STL Street Lights
USL Street Lights Unlit
NSL No Street Lights
STU Street Lights Unknown

FACTORS

+VE Positive Breath Test
R.TURN Right Turn Manoeuvre
O/TAKE Overtaking Manoeuvre
S.VEH Single Vehicle

Special Conditions

ATS OUT Traffic Lights Not Working
ATS DEF Traffic Lights Defective
SIGNS Road Signs Defective or Obscured
RD WRKS Road Works
Surface Road Surface Defective

D-PRINT CRASH REPORT

27-May-2026
15:49:22

Meopham

Accident Date BETWEEN '01-Jan-2021' AND '31-Dec-2025'

No	Location	Severity	Date	Day	Time	Street Lighting	Road Surface	Weather	Pedestrian Direction	Factors	Involved
7	Road No A227 Grid 564408E Section 148 Ref 167188N	SLIGHT	09/08/2021	2	22:50	DRK STL	Wet/Damp	Fine	S	S.VEH	
	A227 WROTHAM ROAD NEAR J/W DENESWAY, MEOPHAM								Gravesham		PED
	Police vehicle was in pursuit of suspect who was on foot. Police vehicle stopped ready to engage with suspect. Member of public has rugby tackled the suspect ending up hitting their face on the number plate of police vehicle.						Veh1, car, S -> N			Casualties 1 Vehicles 1	
8	Road No A227 Grid 564305E Section 150 Ref 167347N	SERIOUS	26/03/2025	4	18:30	L	Dry	Fine		R.TURN	M/C
	A227, WROTHAM RD J/W MELLIKER LANE, MEOPHAM								Gravesham		
	CAD: V1 has turned into Melliker Lane without indication and knocked R2 off motorcycle causing rider to slide along the road and hit roadside furniture.						Veh1, car, NW -> W Veh2, m/cycle > 500cc, SE -> NW			Casualties 1 Vehicles 2	

Key Involved

PED Pedestrian
HGV Heavy Goods Vehicle
GV Goods Vehicle
M/C Motor Cycle
P/C Pedal Cycle
PSV Bus/Coach

Street Lighting

L Daylight
STL Street Lights
USL Street Lights Unlit
NSL No Street Lights
STU Street Lights Unknown

FACTORS

+VE Positive Breath Test
R.TURN Right Turn Manoeuvre
O/TAKE Overtaking Manoeuvre
S.VEH Single Vehicle

Special Conditions

ATS OUT Traffic Lights Not Working
ATS DEF Traffic Lights Defective
SIGNS Road Signs Defective or Obscured
RD WRKS Road Works
Surface Road Surface Defective

Appendix D

LTN 1/20 Walking and Cycling Audit

Street Check

[illegible]

Deviation of Cycle Route	Cycling	ST27	Deviation of cycle route against straight line or shortest alternative.	Deviation factor against straight line or shortest alternative greater than 1.4.	Deviation factor against straight line or shortest alternative 1.2-1.4.	Deviation factor against straight line or shortest alternative less than 1.2.
Pedestrian Crossing Locations	Walking / Wheeling	ST28	Alignment of crossings with desire lines.	No crossings are located on desire lines.	Some crossings are located on desire lines.	All crossings are located on desire lines, and all desire lines are provided for.
Cyclist Delay at Junctions	Cycling	ST29	Delay to cyclists at junctions.	Delay for cyclists at junctions is greater than the delay to motor vehicles.	Delay for cyclists at junctions is similar to that of motor vehicles.	Delay for cyclists is shorter than that of motor vehicles or cyclists are not required to stop at junctions (e.g. bypass at signals).
Cyclist Delay on Links	Cycling	ST30	Delay to cyclists on links.	Cyclists have no opportunities to pass slower moving vehicles (including other cyclists).	Cyclists have some opportunities to pass slower moving vehicles (including other cyclists).	Cyclists can always progress without being delayed by other vehicles.
Pedestrian Delay at Junctions	Walking / Wheeling	ST31	Delay to pedestrians at signal controlled junctions.	Maximum waiting time over 60 seconds.	Maximum waiting time 40-60 seconds.	Maximum waiting time up to 40 seconds.
Pedestrian Delay at Standalone Signal Crossings	Walking / Wheeling	ST32	Delay to pedestrians at stand-alone signal crossings.	After pressing the button, pedestrians must wait over 10 seconds for an invitation to cross.	After pressing the button, pedestrians must wait up to 10 seconds for an invitation to cross.	Crossings rest on the green for pedestrians. Or, the time between pressing the button and the invitation to cross has been minimised as much as is safe to do so.

ATTRACTIVENESS

Wayfinding	Walking / Wheeling / Cycling	ST33	Effectiveness of signage and road markings on wayfinding.	Route signing is poor with signs missing at key decision points. Pedestrians and cyclists follow signs and road markings intended for motor traffic. Or, signs and road markings are faded or unclear.	Some cycle and pedestrian specific direction signing. There are gaps in signage and road markings which could be improved.	Route is well signed for pedestrians and cyclists with signs and road markings located at all decision points and junctions. Signs and road markings are clear, easily visible and legible.
Places to Rest	Walking / Wheeling	ST34	Distance between resting points.	More than 150m.	50-150m.	Less than 50m.
Places to Shelter	Walking / Wheeling	ST35	Distance between shelter points.	More than 150m.	50-150m.	Less than 50m.
Lighting	Walking / Wheeling / Cycling	ST36	Extent of lighting.	Long stretches of darkness. Or, no lighting.	Short stretches of darkness. Or, bat-friendly lighting.	Route lit thoroughly, including any public transport waiting areas.
Cycle Parking	Cycling	ST37	Ease of access to cycle parking on- and off-street.	Insufficient or inappropriate cycle parking.	Some accessible and overlooked cycle parking provided but not enough to meet present demand.	Accessible and overlooked cycle parking provided, sufficient to meet present and future demand, including provision for a range of cycle vehicles and users.
Impact of Cycling on Walking	Walking / Wheeling / Cycling	ST38	Presence of shared use cycle tracks and toucan crossings.	On urban streets, cyclists are expected to use shared use cycle tracks and/or toucan crossings, bringing them into potential conflict with pedestrians. In rural areas or motor traffic free environments, shared use cycle tracks fail the width requirements set out in Table 6-3 of LTN 1/20.	In rural areas or motor traffic free environments, shared use cycle tracks pass the width requirements set out in Table 6-3 of LTN 1/20 and are designed in a way that minimises potential conflict between cyclists and pedestrians.	There are no shared use cycle tracks.

COHESION

Impact of Motor Traffic on Pedestrians and Cyclists	Walking / Wheeling / Cycling	ST39	Measures taken to manage motor traffic in a way that benefits active modes.	There are no measures to manage motor traffic that benefit active modes.	There are some measures to manage motor traffic that benefit active modes.	There are measures to manage motor traffic which prioritise active modes. Or, the route is completely separate from motor traffic.
Transitions for Cyclists	Cycling	ST40	Ability to transition on and off the route safely and easily.	Cyclists cannot transition on or off the route without dismounting.	Cyclists can transition on and off the route with minimal disruption to their journey.	Cyclists have dedicated, legible and understandable transitions on and off the route at all key points. Protected cycle facilities are easy to join and leave.
Route Continuity	Walking / Wheeling / Cycling	ST41	Continuity of walking, wheeling and cycling routes.	Provisions for walking, wheeling and cycling along the route are discontinuous.	Provisions for walking, wheeling and cycling along the route are continuous but may be indirect or have sections which are unintuitive to navigate.	Provisions for walking, wheeling and cycling along the route are direct, continuous, intuitive and legible.
Consistency of Route	Walking / Wheeling / Cycling	ST42	Consistency of provision for pedestrians and cyclists.	Multiple changes of provision on the route.	Some changes of provision on the route.	Provision is consistent throughout the route.

Route Check

Metric	Mode	#	Description	Red 0	Amber 1	Green 2
ACCESSIBILITY						
Barriers	All Active Modes	PA17	Presence and accessibility of barriers.	Key public access points (e.g. interfaces with public highway) to the path are restricted by barriers that would inhibit legitimate users. Or, there are barriers along the path that inhibit legitimate users.	Key public access points (e.g. interfaces with public highway) do not have barriers, but other public access points have barriers that would inhibit legitimate users.	No public access points to the path have barriers that would inhibit legitimate users.
Steps	All Active Modes	PA18	Presence of steps.	Steps are unavoidable at key public access points (e.g. interfaces with public highway). Or, there are unavoidable steps along the path.	A step-free route is possible at key public access points (e.g. interfaces with public highway) and along the path, but steps are present at other public access points.	A step-free route is possible at all public access points and along the path.
Gradient	Walking / Wheeling / Cycling	PA19	Steepest gradient due to underlying terrain. (For gradients at ramps, dropped kerbs and cambers, see metrics SA14 and SA15).	More than 5%.	3-5%.	Less than 3%.
Tactile Information and Signal Equipment	All Active Modes	PA20	Adherence of tactile paving to recommended layouts and colours in 'Guidance on the Use of Tactile Paving Surfaces' and accessibility of signal equipment.	Guidance on tactile paving has not been considered. Or, there is signal equipment which is incorrectly situated, inaccessible or faulty (for example in terms of rotating cones).	Guidance on tactile paving has been considered, but the area is not fully legible.	Guidance on tactile paving has been considered and the area is fully legible.
Ability to Turn Around	All Active Modes	PA21	Presence and frequency of turning points (open and flat areas of at 4m x 4m).	There are no turning points. Or, turning points are over 1km apart or not provided between all public access points.	Turning points are approximately 1km apart.	The path is at least 4m wide. Or, turning points are less than 1km apart and provided between all public access points.
COMFORT						
Width of Shared Use Spaces	All Active Modes	PA22	Effective width of shared use spaces.	Where pedestrians and cyclists are in a shared facility without horses, the width requirements set out in Table 6-3 of LTN 1/20 are not met. Where horses are in a shared facility with pedestrians and/or cyclists, the width is less than 4m.	Where pedestrians and cyclists are in a shared facility without horses, the width requirements set out in Table 6-3 of LTN 1/20 are met. Where horses are in a shared facility with pedestrians and/or cyclists, the width is 4m.	Where pedestrians and cyclists are in a shared facility without horses, the width requirements set out in Table 6-3 of LTN 1/20 are exceeded. Where horses are in a shared facility with pedestrians and/or cyclists, the width is greater than 4m.
Width of Walking and Wheeling Spaces	Walking / Wheeling	PA23	Effective width of dedicated walking/wheeling spaces.	Less than 1.5m.	1.5-2.0m.	More than 2.0m.
Width of Cycling Spaces	Cycling	PA24	Effective width of dedicated cycling spaces.	Less than 2.5m.	2.5-3.0m	More than 3.0m.
Width of Horse Riding Spaces	Horse Riding	PA25	Effective width of dedicated equestrian spaces.	Less than 3.0m (excluding pinch points where an absolute minimum width of 2.0m is maintained over a short distance).	3.0-3.5m (excluding pinch points where an absolute minimum width of 2.0m is maintained over a short distance).	More than 3.5m (excluding pinch points where an absolute minimum width of 2.0m is maintained over a short distance).
Shared Use Surface	All Active Modes	PA26	Surface of shared use facilities.	Unbound or unsealed surface.	Bound, sealed bituminous surface (including spray and chip or resin bound)	Bound and porous surface (e.g. Flexipave).
Walking and Wheeling Surface	Walking / Wheeling	PA27	Type of walking/wheeling surface material.	The surface is low-grip (i.e. PTV of 25 or lower). If paved, the joints are wider than 5mm.	The surface is medium-grip (i.e. PTV of between 25 and 35). If paved, the joints are 5mm or less.	The surface is high-grip (i.e. PTV of 35 or higher). If paved, the joints are mortared.
Cycling Surface	Cycling	PA28	Type of cycling surface material.	Unsurfaced/unbound or unstable blocks/sets.	Hand-laid asphalt or smooth blocks.	Machine-laid asphalt or smooth and firm blocks.
Horse Riding Surface	Horse Riding	PA29	Type of dedicated equestrian surface material (e.g. trotting strips).	Sealed surface, e.g. asphalt or other material rated "reasonable" in Table 5.29 of DMRB CD 143.	A bound and porous surface or other material rated "good" in Table 5.29 of DMRB CD 143.	Grass (or other material rated "excellent" in Table 5.29 of DMRB CD 143) is provided.
Suitability of Crossings	All Active Modes	PA30	Suitability of crossings provided given path users and the volumes and speeds of traffic on roads being crossed.	Not all crossings are suitable for all path users. Or, crossings selected do not follow LTN 1/20 guidance given the volumes and speeds of traffic on roads being crossed.	All crossings are suitable for all path users given the volumes and speeds of traffic on roads being crossed.	All crossings are suitable for all path users and go beyond LTN 1/20 guidance to help future proof the route and provide a higher level of service.

Accessibility of Access Points	All Active Modes	PA31	Potential for access points to be blocked by parking or loading.	Path access points are not protected, meaning there is a risk that they could be blocked by parking or loading, impeding access for some or all path users.	Path access points are suitably protected to maintain access for all path users. Or, there is adequate marked loading and parking provision near access points.	Path access points are suitably protected to maintain access for all path users, and there is adequate marked loading and parking provision near access points.
Drainage	All Active Modes	PA32	Effect of drainage and water on user experience.	The path is occasionally inaccessible or impassable due to the presence of water.	The path is occasionally narrowed due to the presence of water.	The path is passable even during extreme weather events, with a minimum clear width of 3.0m maintained at all times.
DIRECTNESS						
Deviation of Path Against Straight Line	All Active Modes	PA33	Extent to which the path deviates against the straight line.	Deviation factor against straight line greater than 1.4.	Deviation factor against straight line 1.2-1.4.	Deviation factor against straight line less than 1.2.
Deviation of Path Against Nearest Alternative Route	All Active Modes	PA34	Extent to which the path deviates against the nearest alternative route open to motor traffic.	Deviation factor against nearest alternative route greater than 1.4.	Deviation factor against nearest alternative route between 1.2-1.4.	Deviation factor against nearest alternative route less than 1.2.
Crossing Locations	All Active Modes	PA35	Alignment of crossings with desire lines.	No crossings are located on desire lines.	Some crossings are located on desire lines.	All crossings are located on desire lines, and all desire lines are provided for.
Delay at Crossings	All Active Modes	PA36	Delay to path users at signal crossings.	Maximum waiting time over 60 seconds.	Maximum waiting time 40-60 seconds.	Maximum waiting time up to 40 seconds.
ATTRACTIVENESS						
Places to Rest	Walking / Wheeling	PA37	Distance between resting points.	More than 150m.	50-150m.	Less than 50m.
Places to Shelter	Walking / Wheeling	PA38	Distance between shelter points.	More than 150m.	50-150m.	Less than 50m.
Lighting	All Active Modes	PA39	Extent of lighting.	Long stretches of darkness or no lighting.	Short stretches of darkness or inappropriate lighting.	Appropriate lighting throughout the path. Any public transport waiting areas at access points to the path are lit.
Cycle Parking	Cycling	PA40	Ease of access to cycle parking at key points along path.	Insufficient or inappropriate cycle parking.	Some accessible and overlooked cycle parking provided but not enough to meet present demand.	Accessible and overlooked cycle parking provided, sufficient to meet present and future demand, including provision for a range of cycle vehicles and users.
Impact of Users on Each Other	All Active Modes	PA41	Potential for interaction between modes.	In rural areas or motor traffic free environments, shared use cycle tracks fail the width requirements set out in Table 6-3 of LTN 1/20. Or, horses share facilities with pedestrians and cyclists in a facility under 3.0m wide.	Shared use facilities pass the width requirements set out in Table 6-3 of LTN 1/20 and are designed in a way that minimises potential conflict between cyclists and pedestrians. Or, horses share facilities with pedestrians and cyclists in a facility over 3.0m wide.	There are no shared use facilities. If horse-riding is permitted, a separate trotting strip is provided.
COHESION						
Ease of Navigation	All Active Modes	PA42	Ease of navigation when travelling along the route.	There are multiple points along the route where the way forward is unclear due to the path environment, design features, or poor/missing signage.	There is one point along the route where the way forward is unclear due to the path environment, design features, or poor/missing signage.	The way forward along the route is clear due to the path environment and design features. If signage is needed at decision points, it is present.
Wayfinding	All Active Modes	PA43	Effectiveness of signage on wayfinding.	Signage on the route is confusing or missing in places. Links between the path and surrounding routes at access points are not legible.	Signage on the route is regular and consistent, creating legible links between the path and surrounding routes at access points. However, information on nearby destinations is not provided or is limited.	Signage on the route is regular and consistent, creating legible links between the path and surrounding routes at access points. Information on nearby destinations is provided.
Proximity to Destinations	Walking / Wheeling / Cycling	PA44	Route links to public transport interchanges and other destinations. Other destinations could include: • Local high streets • Schools and colleges • Hospitals and healthcare • Access to green and blue spaces • Viewing points • Tourist destinations, etc.	The route is not within 400m of any public transport interchanges or other destinations.	The route is within 400m of a public transport interchange or other destination.	The route is within 400m of at least one public transport interchange and at least one other destination.
Quality of Connections	Walking / Wheeling / Cycling	PA45	Quality of connections to public transport interchanges or other destinations.	Walking, wheeling and cycling connections are inaccessible or offer a low level of service.	Walking, wheeling and cycling connections are accessible and offer a medium level of service.	Walking, wheeling and cycling connections are accessible and offer a high level of service.
Connectivity with Other Horse Riding Routes	Horse Riding	PA46	Connectivity with other routes appropriate for horse riding.	The route does not link to other routes appropriate for horse riding.	The route links to one other route appropriate for horse riding.	The route links to two or more other routes appropriate for horse riding.

Route 1

Wrotham Road between Green Lane and Longfield Road (Incl. The Parade)

Street Check - Audit Categories		Score	
Accessibility			
Gradient		2	
Tactile Information and Signal Equipment		1	
Barriers		1	
Bus Stops		0	
Wheelchair Access		1	
Access to Taxis and Blue Badge Parking		0	
Access to Toilets		2	
Total Score (Out of 14)		7	50%
Comfort			
Cycling Surface Material		2	
Walking/Wheeling Surface Material		1	
Effective Width for Cyclists		-	
Total Score (Out of 4)		3	75%
Directiveness			
Deviation of Cycle Route		2	
Pedestrian Crossing Locations		1	
Cyclist Delay at Junctions		1	
Cyclist Delay on Links		1	
Pedestrian Delay at Junctions		2	
Pedestrian Delay at Standalone Signal Crossings		-	
Total Score (Out of 10)		7	70%
Attractiveness			
Wayfinding		0	
Places to Rest		0	
Places to Shelter		0	
Lighting		1	
Cycle Parking		0	
Impact of Cycling on Walking		2	
Total Score (Out of 12)		3	25%
Cohesion			
Impact of Motor Traffic on Pedestrians and Cyclists		1	
Transitions for Cyclists		-	
Route Continuity		1	
Consistency of Route		1	
Total Score (Out of 6)		3	50%

Path Check - Audit Categories		Score	
Accessibility			
Barriers			
Steps			
Gradient			
Tactile Information and Signal Equipment			
Ability to Turn Around			
Total Score (Out of 10)		0	0%
Comfort			
Width of Shared Use Spaces			
Width of Walking and Wheeling Spaces			
Width of Cycling Spaces			
Width of Horse Riding Spaces			
Shared Use Surface			
Walking and Wheeling Surface			
Cycling Surface			
Horse Riding Surface			
Suitability of Crossings			
Accessibility of Access Points			
Drainage			
Total Score (Out of 12)		0	0%
Directiveness			
Deviation of Path Against Straight Line			
Deviation of Path Against Nearest Alternative Route			
Crossing Locations			
Delay at Crossings			
Total Score (Out of 6)		0	0%
Attractiveness			
Places to Rest			
Places to Shelter			
Lighting			
Cycle Parking			
Impact of Users on Each Other			
Total Score (Out of 10)		0	0%
Cohesion			
Ease of Navigation			
Wayfinding			
Proximity to Destinations			
Quality of Connections			
Connectivity with Other Horse Riding Routes			
Total Score (Out of 10)		0	0%

0
1
2

Route Summary

Street Check		
Criterion	Total Score	%
Accessibility	7/12	50%
Comfort	3/4	75%
Directiveness	7/10	70%
Attractiveness	3/12	25%
Cohesion	3/6	50%
Path Check		
Accessibility	-	-
Comfort	-	-
Directiveness	-	-
Attractiveness	-	-
Cohesion	-	-

Deviation Factor (Walking)

Route if walked	218
Alternative Route	610
Crow flies distance	215
Straight Line =	1.0
Alternative Route =	2.8

Deviation Factor (Cyclists)

Route if cycled	218
Crow flies distance	215
Straight Line =	1.0

Route 2

Longfield Road between Wrotham Road and National Autistic Helen Alison School

Street Check - Audit Categories		Score	
Accessibility			
Gradient	1		
Tactile Information and Signal Equipment	1		
Barriers	1		
Bus Stops	-		
Wheelchair Access	1		
Access to Taxis and Blue Badge Parking	0		
Access to Toilets	0		
Total Score (Out of 12)	4	40%	
Comfort			
Cycling Surface Material	1		
Walking/Wheeling Surface Material	1		
Effective Width for Cyclists	-		
Total Score (Out of 4)	2	50%	
Directiveness			
Deviation of Cycle Route	2		
Pedestrian Crossing Locations	1		
Cyclist Delay at Junctions	1		
Cyclist Delay on Links	1		
Pedestrian Delay at Junctions	2		
Pedestrian Delay at Standalone Signal Crossings	-		
Total Score (Out of 10)	7	70%	
Attractiveness			
Wayfinding	0		
Places to Rest	0		
Places to Shelter	0		
Lighting	1		
Cycle Parking	0		
Impact of Cycling on Walking	2		
Total Score (Out of 12)	3	25%	
Cohesion			
Impact of Motor Traffic on Pedestrians and Cyclists	1		
Transitions for Cyclists	-		
Route Continuity	1		
Consistency of Route	1		
Total Score (Out of 6)	3	50%	

Path Check - Audit Categories		Score	
Accessibility			
Barriers			
Steps			
Gradient			
Tactile Information and Signal Equipment			
Ability to Turn Around			
Total Score (Out of 8)		0	0%
Comfort			
Width of Shared Use Spaces			
Width of Walking and Wheeling Spaces			
Width of Cycling Spaces			
Width of Horse Riding Spaces			
Shared Use Surface			
Walking and Wheeling Surface			
Cycling Surface			
Horse Riding Surface			
Suitability of Crossings			
Accessibility of Access Points			
Drainage			
Total Score (Out of 12)		0	0%
Directiveness			
Deviation of Path Against Straight Line			
Deviation of Path Against Nearest Alternative Route			
Crossing Locations			
Delay at Crossings			
Total Score (Out of 6)		0	0%
Attractiveness			
Places to Rest			
Places to Shelter			
Lighting			
Cycle Parking			
Impact of Users on Each Other			
Total Score (Out of 10)		0	0%
Cohesion			
Ease of Navigation			
Wayfinding			
Proximity to Destinations			
Quality of Connections			
Connectivity with Other Horse Riding Routes			
Total Score (Out of 10)		0	0%

0
1
2

Route Summary

Street Check		
Criterion	Total Score	%
Accessibility	3/10	30%
Comfort	2/4	50%
Directiveness	7/10	70%
Attractiveness	3/12	25%
Cohesion	3/6	50%
Path Check		
Accessibility	-	-
Comfort	-	-
Directiveness	-	-
Attractiveness	-	-
Cohesion	-	-

Deviation Factor (Walking)

Route if walked	250
Alternative Route	775
Crow flies distance	253
Straight Line =	1.0
Alternative Route =	3.1

Deviation Factor (Cyclists)

Route if cycled	250
Crow flies distance	253
Straight Line =	1.0

Route 3

Wrotham Road between Green Lane and Station Road

Street Check - Audit Categories	Score	
Accessibility		
Gradient	2	
Tactile Information and Signal Equipment	1	
Barriers	-	
Bus Stops	1	
Wheelchair Access	2	
Access to Taxis and Blue Badge Parking	1	
Access to Toilets	1	
Total Score (Out of 12)	8	80%
Comfort		
Cycling Surface Material	2	
Walking/Wheeling Surface Material	1	
Effective Width for Cyclists	-	
Total Score (Out of 4)	3	75%
Directiveness		
Deviation of Cycle Route	2	
Pedestrian Crossing Locations	2	
Cyclist Delay at Junctions	1	
Cyclist Delay on Links	1	
Pedestrian Delay at Junctions	2	
Pedestrian Delay at Standalone Signal Crossings	-	
Total Score (Out of 10)	8	80%
Attractiveness		
Wayfinding	0	
Places to Rest	0	
Places to Shelter	0	
Lighting	1	
Cycle Parking	1	
Impact of Cycling on Walking	2	
Total Score (Out of 12)	4	33%
Cohesion		
Impact of Motor Traffic on Pedestrians and Cyclists	1	
Transitions for Cyclists	-	
Route Continuity	1	
Consistency of Route	1	
Total Score (Out of 6)	3	50%

Path Check - Audit Categories		Score	
Accessibility			
Barriers			
Steps			
Gradient			
Tactile Information and Signal Equipment			
Ability to Turn Around			
Total Score (Out of 8)		0	0%
Comfort			
Width of Shared Use Spaces			
Width of Walking and Wheeling Spaces			
Width of Cycling Spaces			
Width of Horse Riding Spaces			
Shared Use Surface			
Walking and Wheeling Surface			
Cycling Surface			
Horse Riding Surface			
Suitability of Crossings			
Accessibility of Access Points			
Drainage			
Total Score (Out of 12)		0	0%
Directiveness			
Deviation of Path Against Straight Line			
Deviation of Path Against Nearest Alternative Route			
Crossing Locations			
Delay at Crossings			
Total Score (Out of 6)		0	0%
Attractiveness			
Places to Rest			
Places to Shelter			
Lighting			
Cycle Parking			
Impact of Users on Each Other			
Total Score (Out of 10)		0	0%
Cohesion			
Ease of Navigation			
Wayfinding			
Proximity to Destinations			
Quality of Connections			
Connectivity with Other Horse Riding Routes			
Total Score (Out of 10)		0	0%

0
1
2

Route Summary

Street Check		
Criterion	Total Score	%
Accessibility	8/12	80%
Comfort	3/4	75%
Directiveness	8/10	80%
Attractiveness	4/12	33%
Cohesion	3/6	50%
Path Check		
Accessibility	-	-
Comfort	-	-
Directiveness	-	-
Attractiveness	-	-
Cohesion	-	-

Deviation Factor (Walking)

Route if walked	1000
Alternative Route	1000
Crow flies distance	1080
Straight Line =	0.9
Alternative Route =	0.9

Deviation Factor (Cyclists)

Route if cycled	1000
Crow flies distance	1080
Straight Line =	0.9

Route 4

Wrotham Road between Longfield Road and Steele's Lane

Street Check - Audit Categories		Score	
Accessibility			
Gradient	2		
Tactile Information and Signal Equipment	1		
Barriers	-		
Bus Stops	1		
Wheelchair Access	1		
Access to Taxis and Blue Badge Parking	0		
Access to Toilets	0		
Total Score (Out of 12)	5	36%	
Comfort			
Cycling Surface Material	2		
Walking/Wheeling Surface Material	1		
Effective Width for Cyclists	-		
Total Score (Out of 4)	3	75%	
Directiveness			
Deviation of Cycle Route	2		
Pedestrian Crossing Locations	1		
Cyclist Delay at Junctions	1		
Cyclist Delay on Links	1		
Pedestrian Delay at Junctions	1		
Pedestrian Delay at Standalone Signal Crossings	1		
Total Score (Out of 12)	7	58%	
Attractiveness			
Wayfinding	0		
Places to Rest	0		
Places to Shelter	0		
Lighting	0		
Cycle Parking	0		
Impact of Cycling on Walking	2		
Total Score (Out of 12)	2	17%	
Cohesion			
Impact of Motor Traffic on Pedestrians and Cyclists	1		
Transitions for Cyclists	0		
Route Continuity	1		
Consistency of Route	0		
Total Score (Out of 6)	2	33%	

Path Check - Audit Categories		Score	
Accessibility			
Barriers			
Steps			
Gradient			
Tactile Information and Signal Equipment			
Ability to Turn Around			
Total Score (Out of 10)	0		0%
Comfort			
Width of Shared Use Spaces			
Width of Walking and Wheeling Spaces			
Width of Cycling Spaces			
Width of Horse Riding Spaces			
Shared Use Surface			
Walking and Wheeling Surface			
Cycling Surface			
Horse Riding Surface			
Suitability of Crossings			
Accessibility of Access Points			
Drainage			
Total Score (Out of 12)	0		0%
Directiveness			
Deviation of Path Against Straight Line			
Deviation of Path Against Nearest Alternative Route			
Crossing Locations			
Delay at Crossings			
Total Score (Out of 4)	0		0%
Attractiveness			
Places to Rest			
Places to Shelter			
Lighting			
Cycle Parking			
Impact of Users on Each Other			
Total Score (Out of 10)	0		0%
Cohesion			
Ease of Navigation			
Wayfinding			
Proximity to Destinations			
Quality of Connections			
Connectivity with Other Horse Riding Routes			
Total Score (Out of 10)	0		0%

0
1
2

Route Summary

Street Check		
Criterion	Total Score	%
Accessibility	5/12	29%
Comfort	3/4	75%
Directiveness	7/12	58%
Attractiveness	2/12	17%
Cohesion	2/6	33%
Path Check		
Accessibility	-	-
Comfort	-	-
Directiveness	-	-
Attractiveness	-	-
Cohesion	-	-

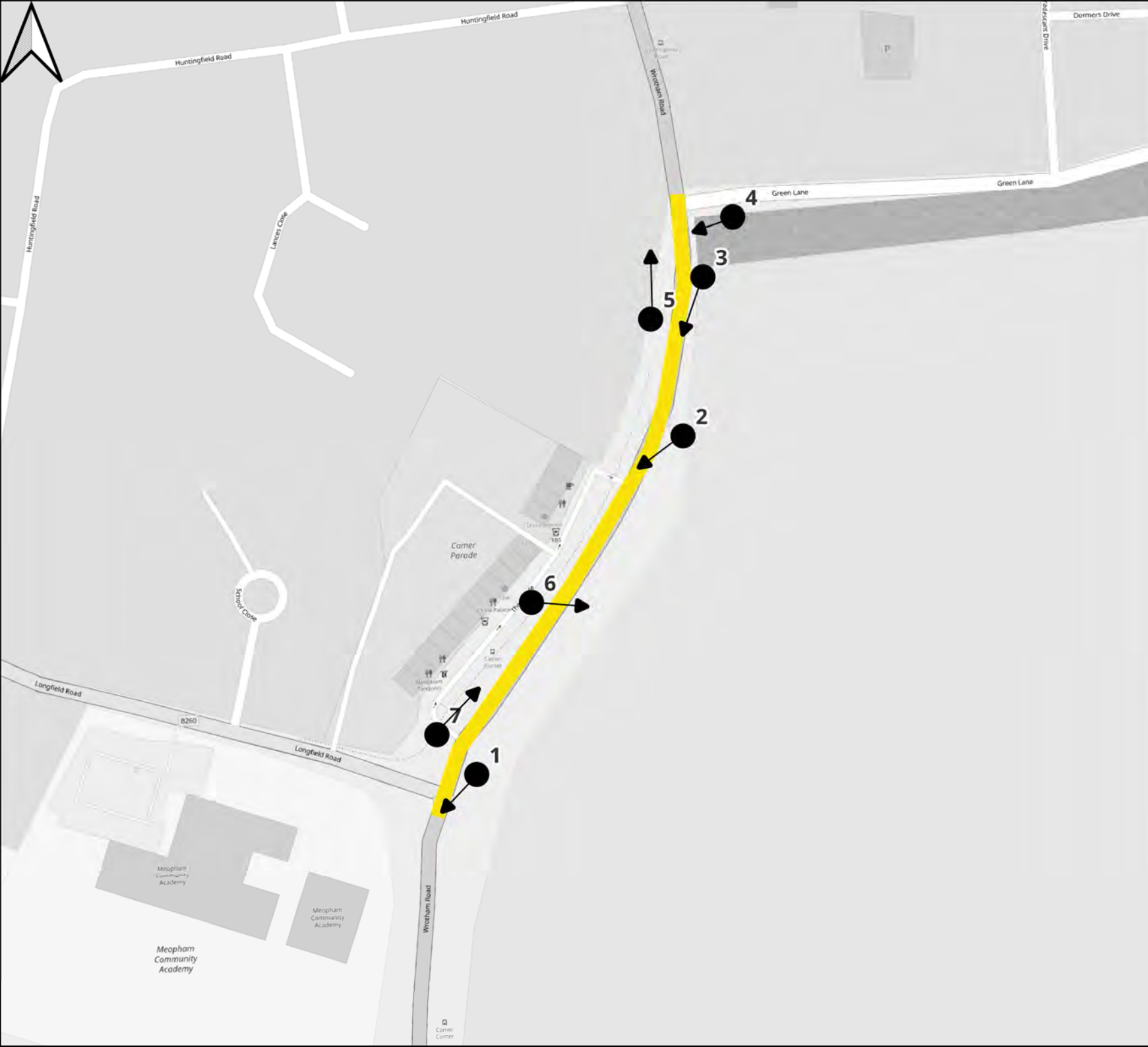
Deviation Factor (Walking)

Route if walked	914
Alternative Route	914
Crow flies distance	902
Straight Line =	1.0
Alternative Route =	1.0

Deviation Factor (Cyclists)

Route if cycled	914
Crow flies distance	902
Straight Line =	1.0

	Street Check							
	Route 1		Route 2		Route 3		Route 4	
Criterion	Total Score	%	Total Score	%	Total Score	%	Total Score	%
Accessibility	7/12	50%	3/10	30%	8/12	80%	5/12	29%
Comfort	3/4	75%	2/4	50%	3/4	75%	3/4	75%
Directiveness	7/10	70%	7/10	70%	8/10	80%	7/12	58%
Attractiveness	3/12	25%	3/12	25%	4/12	33%	2/12	17%
Cohesion	3/6	50%	3/6	50%	3/6	50%	2/6	33%



Legend

● Audit Photo Locations

Route 1

Route 1

 Richborough

 **hub**
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0 40 80 m



View 1



View 2



View 3



View 4



View 5

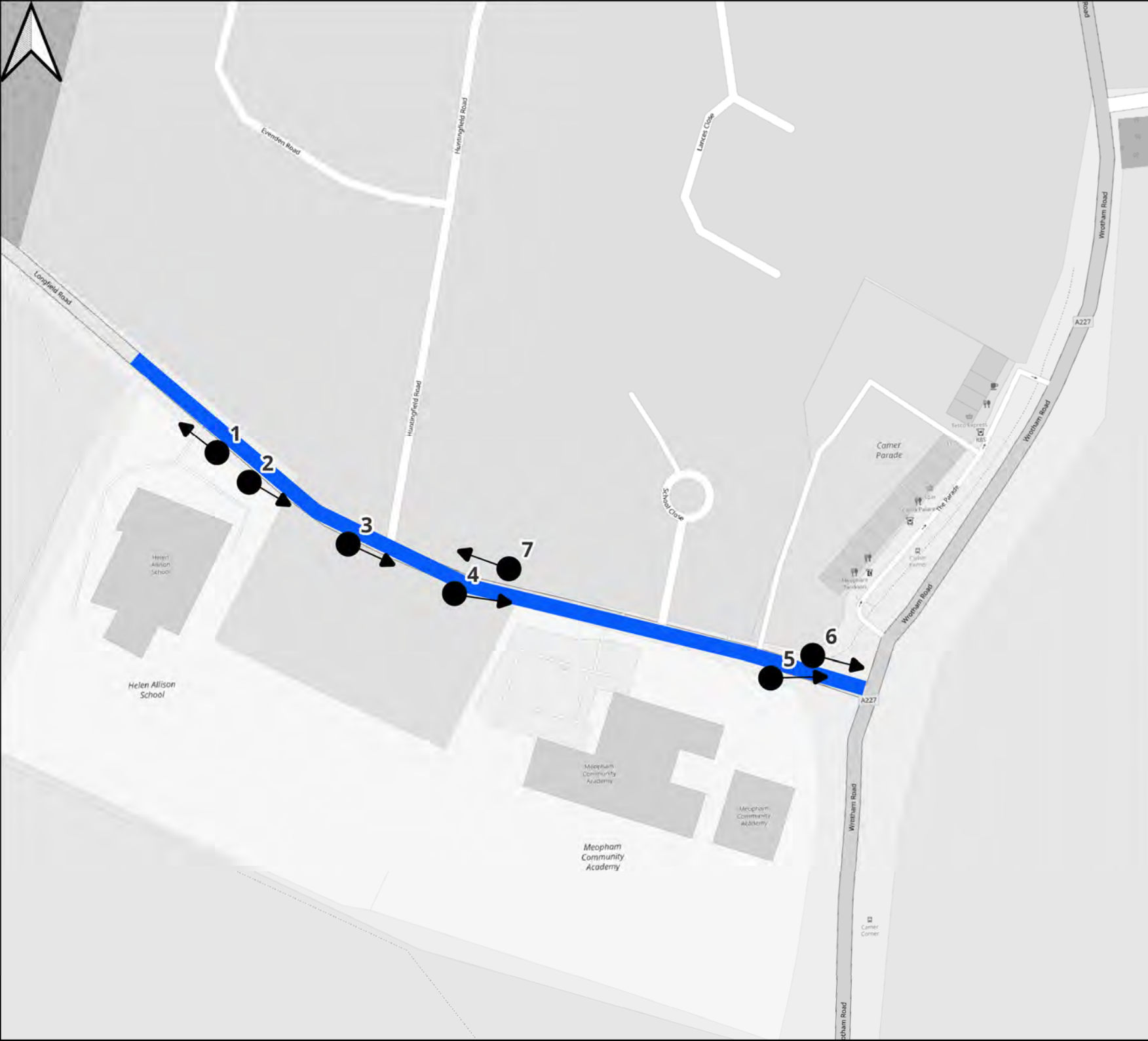


View 6



View 7





Legend

- Audit Photo Locations
- Route 2

Route 2

 Richborough

 **hub**
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0 40 80 m



View 1



View 2



View 3



View 4



View 5



View 6



View 7





Legend

- Audit Photo Locations
- Route 3

Route 3

 Richborough

 **hub**
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0 100 200 m



View 1



View 2



View 3



View 4



View 5



View 6



View 7



View 8



View 9



View 10



View 11



View 12



View 13



View 14



View 15



View 16



View 17



View 18



View 19



View 20



View 21

