



National Highways Planning Response (NHPR 25-01) Formal Recommendation to an Application for Planning Permission

From: Michelle Berrington (Head of Planning & Development)
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South East Region
National Highways
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To: Gravesham Borough Council (FAO Mrs Alison Webster)
planning.reps@gravesham.gov.uk

CC: transportplanning@dft.gov.uk
spatialplanning@nationalhighways.co.uk

Council's Reference: 20251116

Location: Land West Of, Norwood Lane, Meopham, Gravesend Kent

Proposal: Outline application with all matters reserved (except access) for a development of up to 150 dwellings (Use Class C3), including affordable dwellings, and associated landscaping, public open space and infrastructure work.

National Highways Ref: NH/25/13854

Referring to the consultation on a planning application dated 5 November 2025 referenced above, in the vicinity of the A2 that forms part of the Strategic Road Network, notice is hereby given that National Highways formal recommendation is that we:

- a) offer no objection (see reasons at Annex A);
- b) recommend that conditions should be attached to any planning permission that may be granted (see Annex A – National Highways recommended Planning Conditions & reasons);
- c) recommend that planning permission not be granted for a specified period (see reasons at Annex A);
- d) recommend that the application be refused (see reasons at Annex A)

Highways Act 1980 Section 175B is not relevant to this application.¹

This represents National Highways' formal recommendation and is copied to the Department for Transport as per the terms of our Licence.

Should the Local Planning Authority propose not to determine the application in accordance with this recommendation they are required to consult the Secretary of State for Transport, as set out in the [Town and Country Planning \(Development Affecting Trunk Roads\) Direction 2018](#), via transportplanning@dft.gov.uk and may not determine the application until the consultation process is complete.

The Local Planning Authority must also copy any consultation under the 2018 Direction to PlanningSE@nationalhighways.co.uk.

This response and all comments outlined herein are made in respect of planning matters only in National Highways' position as a statutory planning consultee, and does not confer any proprietary rights nor amount to the giving or refusal of consent, assent, approval, or awareness of or by National Highways in or of any other aspects or matters (including, but not limited to, the use of property belonging to National Highways). If anyone wishes for National Highways to consider any aspects which do not relate to planning submissions, they should call our contact centre on 0300 123 5000.

	Date: 8 December 2025
Signature: 	
Name: Bidur Rajbhandari	Position: Assistant Spatial Planner
National Highways Bridge House, 1 Walnut Tree Close, Guildford GU1 4LZ	

Annex A National Highways' assessment of the proposed development

National Highways has been appointed by the Secretary of State for Transport as a strategic highway company under the provisions of the Infrastructure Act 2015 and is the highway authority, traffic authority and street authority for the Strategic Road Network (SRN). The SRN is a critical national asset and as such we work to ensure that it operates and is managed in the public interest, both in respect of current activities and needs as well as in providing effective stewardship of its long-term operation and integrity.

¹ Where relevant, further information will be provided within Annex A.

Recommend that planning permission not be granted for a specified period:

Reasons

It is recommended that the application should not be determined for a period of three months until **9 March 2026**.

This recommendation can be replaced, renewed, or reviewed during the three-month period, or at its end, dependent on progress made with regards to the outstanding matters.

We will be concerned with proposals that have the potential to impact on the safe and efficient operation of the SRN, in this case, particularly within the vicinity of A2 Junction A2/A227.

We require further information to be provided by the applicant on this application in order that an informed decision can be made in relation to the potential impacts of the development on the strategic road network. In particular, the following comments should be passed onto the applicant:

Throughout this response **ACTION points** for the applicant are highlighted in **underlined bold**.

Policy

It is noted that i-Transport has not referred to DfT Circular 01/2022 within the TA or TP, however, has referenced National Planning Policy Framework (NPPF) (2024) and Planning Policy Guidance (PPG).

There is a need to refer and adhere to Circular 01/2022 within the TA and TP

Transport Vision

The Transport Assessment (TA) adopts a vision-led approach, focusing on prioritising Active Travel and Sustainable Transport, would suggest that i-Transport's proposed vision aligns with the vision advice set out in DfT Circular 01/2022.

Personal Injury Accident Data

The need for any collision analysis to be undertaken for any section/junctions on the SRN can be determined once there is an agreed proposed development trip generation, distribution and assignment

Baseline Target Mode Share

I-Transport has derived the baseline mode share for 2025 for MSOA Gravesham 012 using the TEMPRO database. We have compared this to the method of travel to work data from the 2011 and 2021 census for the same MSOA, as shown in Table 1.

Table 1 Baseline mode share

Method	TEMPRO 2025	2011 Census	2021 Census
Walk	14.2%	4.0%	4.2%
Cycle	1.3%	0.4%	0.3%
Car	48.2%	72.4%	80.2%
Car passenger	30.95	4.0%	3.8%
Bus	4.1%	3.9%	1.5%
Rail	1.35%	13.3%	7.7%
Other	0.0%	0.4%	1.4%
Total	100%	100%	100%

As shown in Table 1, the TEMPRO data suggests an unrealistically high percentage of car passengers and a low percentage of car users, which is inconsistent with the corresponding figures from both census 2011 and 2021 datasets.

Additionally, the TEMPRO data appears to underestimate the proportion of journeys made by rail, especially given the presence of a railway station within the MSOA that is accessible by foot from most of Meopham.

Given the above, we require the baseline mode share for the site to be based on Census 2011 data, and any target mode share should be based on this.

Proposed Trip Rate and Generation

I-Transport has derived the proposed residential person trip rates from the TRICS online database (version 7.11.4) which is appropriate. However, the TEMPRO data suggest an unrealistically high percentage of car passengers and a low percentage of car users and also appears to underestimate the proportion of journeys made by rail.

Therefore, the vehicle trip generation should be calculated using either the relevant TRICS vehicle trip rates or derived from the person trip rates using Census 2011 mode share data for the MSOA area in which the proposed development is located.

Trip Distribution and Assignment

-Transport has calculated the vehicle trip distribution using Census 2011 Journey to Work data. However, the distribution/assignment does not extend to the SRN, specifically the A2 / A227 junction. The principle of the methodology is appropriate.

However, the presented distribution and assignment analysis does not consider the SRN. The traffic flow diagrams should be extended to include turning movements at the A2/A227 junction.

Impact on SRN

Based on the current information, we have been unable to determine the proposed development impact on the SRN.

The need for any DfT Circular 01/2022 compliant assessment to be undertaken for any section/junctions on the SRN can be determined once there is an agreed proposed development trip generation, distribution and assignment

CEMP Requirements

Given the location of the proposed development site, we are likely to recommend that a Construction Environmental Management Plan (CEMP) be secured via planning condition at the appropriate stage of the planning process.

Standing advice to the local planning authority

The Climate Change Committee's [2022 Report to Parliament](#) notes that for the UK to achieve net zero carbon status by 2050, action is needed to support a modal shift away from car travel. The NPPF supports this position, with paragraphs 77 and 110 prescribing that significant development should offer a genuine choice of transport modes, while paragraphs 109 to 116 etc advise that appropriate opportunities to promote walking, cycling and public transport should be taken up as part of a vision-led approach.

Moreover, the carbon reduction hierarchy (avoid-switch-improve) as set out in clause 4.3 of PAS2080:2023 promotes approaches and measures to minimise resource consumption and thereby reduce carbon emissions.

These considerations should be weighed alongside any relevant Local Plan policies to ensure that planning decisions are in line with the necessary transition to net zero carbon.