



National Highways Planning Response (NHPR 26-09) Formal Recommendation to an Application for Planning Permission

From: Hermes Luli (Head of Planning & Development)
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To: Gravesham Borough Council (FAO Mrs Katherine Parkin)
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CC: transportplanning@dft.gov.uk
spatialplanning@nationalhighways.co.uk

Council's Reference: 20250992

Location: Land At Wrotham Road, Meopham, Gravesend Kent DA13 0AN

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.

National Highways Ref: NH/25/13761

Referring to the consultation on a planning application dated 3 October 2025 referenced above, in the vicinity of the A2 and M20 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, regarding the highway authority consent required for trunk road access, is 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 must 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.

Signature:



Date: 13/10/2026

Name: Bidur Rajbhandari

Position: Assistant Spatial Planner

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

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.

Recommendation: Conditions should be attached to any planning permission that may be granted

Background

Further to our NHPR of 26 August 2026 a Transport Technical Note 2 (TTN2) prepared by Ridge and dated 07 September 2026 have been reviewed with reference to previous comments.

Policy Context

TTN2 does not provide the development vision, however details are provided regarding the sustainable transport measures which are proposed including:

- Contributions to improve the standard and frequency of bus services and bus infrastructure
- Contributions towards proposed emerging cycle route proposals along the A227
- Localised cycle/footway provision along the site frontage
- Signal crossing facility on Wrotham Road 14

The presented measures to reduce vehicular traffic are concluded to be acceptable

Collision Analysis

The collision data between 01 January 2021 and 31 December 2025 is provided within Appendix E of TTN2. We have reviewed the submitted collision data; the collisions are seen to be primarily rear-end and side swipe with slight severity. It is concluded that there are no significant existing safety concerns in the vicinity of the A2 / A227 Wrotham Road junction.

Trips Rates and Trip Generation

It is noted the assessment has been undertaken based on the pre-vision trip generation. While we note in accordance with DfT Circular 01/2022 assessment should undertaken based on vision-led trip generation, in this instance this is unlikely to have a significant bearing on the review.

Traffic Flow Diagrams

The traffic flow diagrams are concluded to be acceptable.

Junction Assessment

TTN2 contains the following two sets of assessment:

- 2028 Future Year – based on Former Tollbooth Hotel (FTH) assessment
- 2030 Future Year – based on Land at Rose Farm (RF) assessment

We have undertaken this review based on the 2028 Future Year assessment based on the FTH assessment. This approach accords with the requirements of DfT Circular 2022 and considers the required committed development and background traffic growth. This approach also reflects the calibration undertaken by FTH based on 2023 traffic flows which we previously accepted.

The presented results have been reviewed against the provided Junctions input files and the PDFs contained within TTN2 Appendix J and are confirmed to be consistent. We note the need for mitigation as a result of queueing on the A2 westbound off-slip.

Interim Mitigation Scheme

TTN2 contains assessment of the 'interim mitigation scheme' which was developed in association with FTH. The assessment has been undertaken using the lane simulation mode within Junctions as a result of the need to assess the impact of the change in movements permitted from the nearside lane.

The AM peak hour assessment results show that the queue on A2 westbound off-slip increasing from 61 PCU to 76 PCU as a result of the proposed development.

The PM peak hour assessment results show the queue on A2 westbound off-slip increasing from 26 PCU to 38 PCU as a result of the proposed development.

TTN2 concludes that it is necessary for the final mitigation scheme to be considered given the forecast queueing with the interim mitigation scheme. We have undertaken review of the submitted Junctions models and agree with the conclusions of TTN2.

Final Mitigation Scheme

TTN2 contains assessment of the final mitigation scheme, with the LinSig consistent with that developed in association with Land at Rose Farm. We acknowledge the modification to the pedestrian intergreen and confirm this is acceptable.

We note that with all scenarios the queue on the A2 westbound off-slip is a maximum of 6 PCU. The development is seen to not adversely impact on the queueing on A227 Wrotham Road north.

We agree with the applicant that the development will require the final mitigation scheme to be implemented and the analysis carried out including the final mitigation scheme demonstrates that junction performance is forecast to be acceptable.

Conditions

A227 Wrotham Road/A2 Roundabout (westbound off-slip) Mitigation

Prior to the occupation of the development hereby permitted, the improvement scheme identified for the A227 Wrotham Road/A2 Roundabout (westbound off-slip) as shown in approved drawing ref: JAC-A2-HGN-DR-1200-001 Rev P01 (Jacobs, August 2020), shall be completed and open to traffic.

Reason: To mitigate the impact of the development on the A2, in accordance with plan making policy TR6 of the NPPF (August 2026) and paragraph 40 of the DfT Circular 01/2022.

Pre-Commencement condition

Construction Traffic Management Plan

No works shall commence on the site hereby permitted (including site clearance or preparation) until the details of a Construction Traffic Management Plan have been submitted to and approved in writing by the local planning authority (who shall consult with National Highways). Thereafter the construction of the development shall proceed in strict accordance with the approved Construction Traffic Management Plan.

Reason: To ensure that the A2 Trunk Road continues to be an effective part of the national system of routes for through traffic in accordance with section 10 of the Highways Act 1980 and in accordance with TR3 of NPPF (August 2026) to satisfy the reasonable requirements of highway safety.

Informative: The CTMP shall include details (text, maps and drawings as appropriate) of the scale, timing and mitigation of all construction-related aspects of the development. It will include, but is not limited to: site hours of operation; numbers, frequency, routing and type of vehicles visiting the site; travel plan and guided access/egress and parking arrangements for site workers, visitors and deliveries; plus sheeting of loose loads and wheel washing and other facilities to prevent dust, dirt, detritus etc. from entering the public highway (and means to remove if it occurs).

Standing advice to the local planning authority

The UK Government has committed to achieving net zero greenhouse gas emissions by 2050 through amendments to the Climate Change Act 2008. The National Planning Policy Framework (NPPF) supports this objective, with Chapter 5 recognising the need to support the transition to a low carbon future and contribute to achieving net zero by 2050. Policies CC2 and TR3 promote sustainable patterns

of movement, reduce reliance on the private car and seek to ensure that significant development is located where it offers a genuine choice of transport modes.

Policies TR3 and TR4 also advise that opportunities to improve walking, wheeling, cycling and public transport should be taken up as part of a vision-led approach to creating sustainable, inclusive and well-connected places.

These considerations should be weighed alongside any relevant Development Plan policies to ensure that planning decisions support sustainable travel patterns and align with the transition to net zero by 2050.