



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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To: Gravesham Borough Council (FAO Mrs Alison Webster)
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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 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.

Signature:		Date: 26 November 2025				
<table style="width: 100%; border-collapse: collapse;"><tr><td style="width: 50%;">Name: Bidur Rajbhandari</td><td style="width: 50%;">Position: Assistant Spatial Planner</td></tr><tr><td colspan="2">National Highways Bridge House, 1 Walnut Tree Close, Guildford GU1 4LZ</td></tr></table>			Name: Bidur Rajbhandari	Position: Assistant Spatial Planner	National Highways Bridge House, 1 Walnut Tree Close, Guildford GU1 4LZ	
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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 **27 February 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 and M20.

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**.

Trip Distribution and Assignment

The TA states that '*Trip distribution and modelling should be undertaken in line with the Kent Transport Model (KTM)/Gravesham Transport Model (GTM).*' We welcome this approach to establish the trip Distribution.

The impact on SRN junction specially on A2 can be assessed after the distribution is established. We request this information before assessing the impact.

It should be noted here that the SRN junctions around the site is sensitive to flow changes specially the A2/Wrotham Road junction. This junction has been subject to study for a number of applications around the area.

Also, it should be noted that GBC regulation 19 is being prepared and publication may be imminent which may impact this development with regards to traffic impacts.

Though the impact assessment has not been carried out please note the following for any addendums.

Transport Vision

Please note that the TA should include a vision for the site prepared in accordance with the requirements of DfT Circular 01/2022 and also set out how the vision will be realised, with details of supporting measures.

Personal Injury Accident Data

STATS 19 level accident data will be required for area that will be required for location that will depend on potential impact on SRN

Committed Development/Schemes

There may also be a need to review the committed developments considering the requirements of DfT Circular 01/2022. There will also be a need to agree the committed developments with the LPA and to then provide this information to National Highways for review depending on the area of impact.

Assessment Years

Opening Year: In line with DfT Circular 01/2022, assessment should be based on the opening year, defined as when first occupation is possible, unless otherwise agreed.

TEMPRO Growth Factors: Full details of how the TEMPRO factors have been derived should be provided for review. Furthermore, any adjustments related to committed development should be fully documented and will need to be agreed with National Highways.

Trip Rates and Trip Generation

The proposed residential vehicle trip rates methodology shown in the TA has unit range on 100- 140. Please note that the proposal is for 350 dwelling units. A revised trip generation exercise needs to be carried out to reflect the quantum of the proposal.

Merge/Diverge Assessment

Please note that until the trip generation, distribution and assignment are all agreed, we are unable to confirm the need for, or extent of SRN assessment required.

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.