

For Attention of: Alison Webster, Gravesham BC

Your Reference: 20250993 - Land Adjacent to Longfield Road Meopham
Gravesend Kent DA13 0EW

Proposal: Outline application for the erection of up to 120 residential dwellings, public open space and associated works. Approval is sought for the principal means of vehicular access from Longfield Road and all other matters are reserved

Our Reference: NH/25/13748

Dear Alison,

Further to the above application we have been consulted by the applicant on this and a second site (GB/20250992 - land east of Wrotham Road) and have provided the following response:

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

Please note that our initial 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 trip generation set out in TA would only be accepted as a 'pre-vision' scenario when this is carried out.

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.

Until the above issues along with all issues outlined in our holding recommendation (NHPR) sent on 26 February 2026 are addressed the holding recommendation still holds to allow the applicant to address those issues.

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