



## National Highways Planning Response (NHPR 25-01) 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 Alison Webster)  
[planning.reps@gravesham.gov.uk](mailto:planning.reps@gravesham.gov.uk)

CC: [transportplanning@dft.gov.uk](mailto:transportplanning@dft.gov.uk)  
[spatialplanning@nationalhighways.co.uk](mailto: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.<sup>1</sup>

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](mailto: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](mailto: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:** 9 March 2025

**Name:** Bidur Rajbhandari

**Position:** Assistant Spatial Planner

**National Highways**

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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

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<sup>1</sup> Where relevant, further information will be provided within Annex A.

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.

### **Recommend No Objection:**

#### **Reasons**

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.

National Highways role is to consider the impacts on the SRN and any need for mitigation. All local road matters (including active & sustainable transport matters) will be dealt with by relevant local highway authority.

We have reviewed the technical note provided by the applicant after our comments on 8/12/25 and have the following comments.

#### **Baseline Mode Share and vehicle trip generation**

I-Transport has net presented the vehicle trip generation using the 2011 Journey to Work census data, arguing that the Census only covers journeys to work and does not account for other purposes such as school and retail trips, whereas the TEMPro data used within the TA considers all journey types.

While we agree that the proposed development will generate school and retail trips, the majority of trips during the peak hours will be predominantly commuter trips. Therefore, greater emphasis should have been placed on journeys to work in the peak mode share rather than all purposes— especially considering that I-Transport's TA assigned only 1.35% of trips to rail (as shown in Table 1), despite the site's close proximity to Meopham train station that serves London Victoria.

Given the substantial variance between the TEMPro mode share and both Census datasets, an unknown weight has been placed on non-commuting trip purposes during the peak periods within I-Transport analysis, especially considering the low percentage of trips made by rail.

I-Transport has not provided evidence to support the use of an all-purpose mode share for peak-hour assessment, nor has it disclosed the underlying peak-period purpose weights within TEMPro. Without transparent evidence on how commuting, education, and retail trips are represented in the peak, the reliance on an all-purpose mode share is not justified and likely under forecasts the proportion of commuter trips. This methodological choice therefore undermines confidence in the resulting mode share and trip assignment for the proposed development.

A comparison of the baseline mode share using data from various sources is shown below.

**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%         |
| <b>Car</b>           | <b>48.2%</b> | <b>72.4%</b> | <b>80.2%</b> |
| <b>Car passenger</b> | <b>30.95</b> | <b>4.0%</b>  | <b>3.8%</b>  |
| Bus                  | 4.1%         | 3.9%         | 1.5%         |
| <b>Rail</b>          | <b>1.35%</b> | <b>13.3%</b> | <b>7.7%</b>  |
| Other                | 0.0%         | 0.4%         | 1.4%         |
| Total                | 100%         | 100%         | 100%         |

### Proposed Trip Rate and Generation

Table 2, presents i-Transport's total proposed peak period vehicle trip rate, alongside a comparative vehicle trip generation calculated by applying the 2011 census car mode share to the proposed person trip generation.

*Table 2. JSJV analysis of proposed vehicle trip generation*

|                     | AM Peak Period (08:00-09:00) |            |            | PM Peak Period (17:00-18:00) |            |            |
|---------------------|------------------------------|------------|------------|------------------------------|------------|------------|
|                     | Arrivals                     | Departures | Two-way    | Arrivals                     | Departures | Two-way    |
| TEMPRO (48.2%)      | 17                           | 57         | 74         | 42                           | 19         | 61         |
| 2011 Census (72.4%) | 26                           | 88         | 113        | 61                           | 30         | 91         |
| <b>Variance</b>     | <b>+9</b>                    | <b>+30</b> | <b>+39</b> | <b>+20</b>                   | <b>+11</b> | <b>+31</b> |

As shown in Table 2, applying the 2011 census car mode share to the proposed person trip generation results in the development being forecast to generate 39 more two-way vehicle trips during the AM peak and 31 more during the PM peak, compared to projections based on TEMPro data.

As shown in the next section, even when applying the 2011 census car mode share levels, the assessment indicates that the proposed development would not generate a material increase in vehicle trips on the SRN and therefore is unlikely to result in any severe impact on the operation or highway safety of any junction.

## **Trip Distribution and Assignment**

I-Transport has calculated vehicle trip distribution using 2011 Journey to Work census data. We would note that previously, the distribution does not extend to the SRN, specifically the A2 / A227 junction; I-Transport has now presented the distribution to the SRN.

We have reviewed the traffic flows diagrams in the TA and the 2011 Census “Journey to Work” data and would consider the proposed distribution and assignment methodology to be appropriate for the proposed development.

I-Transport forecast 21 two-way vehicle trips in the AM peak and 23 two-way vehicle trips in the PM peak at the A2 / A227 junction. From this, only 8 and 9 two-way vehicle trips assign to the SRN, the majority continue along the A227 towards Gravesend. this analysis is based on the vehicle trip generation calculated using the TEMPro mode share data.

When applying the 72.4% car mode share trip generation, a total of 30 vehicle trips is forecast to head north towards the A2 during the AM peak. In the PM peak, 30 vehicle trips are forecast to travel south along the A227 from the A2.

Considering that a significant proportion of these trips will continue along the A227 towards Gravesend for employment opportunities, not all vehicle trips will use the A2.

We therefore agree that the forecast volume of vehicle trips on the SRN is unlikely to result in a material increase in traffic, and as such, is not expected to have a severe impact on the operation or highway safety of the SRN. This is particularly relevant given the proposed development’s proximity to the railway station, which provides further potential to reduce car trips

### **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.