



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

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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)~~

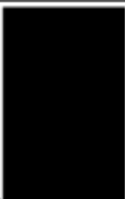
Highways Act 1980 Section 175B is not relevant to this application.¹

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 May 2026				
<table style="width: 100%; border-collapse: collapse;"><tr><td style="width: 50%;">Name: Bidur Rajbhandari</td><td style="width: 50%; text-align: right;">Position: Assistant Spatial Planner</td></tr><tr><td colspan="2" style="padding-top: 10px;">National Highways Ground Floor, Building 1000, Cathedral Square, Guildford GU2 7YL www.nationalhighways.co.uk</td></tr></table>			Name: Bidur Rajbhandari	Position: Assistant Spatial Planner	National Highways Ground Floor, Building 1000, Cathedral Square, Guildford GU2 7YL www.nationalhighways.co.uk	
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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

¹ 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.

Background

Further to our NHPR of 27 February 2026 we have been consulted by the applicant with further information on Strategic Model outputs prior to modelling work being undertaken at A2/Wrotham Road junction.

Furthermore, they have confirmed that a Transport Assessment Addendum will be provided in due course to address the issues raised.

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

It is recommended that the application should not be determined for a period of three months until **26 August 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.

Reasons

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**.

Strategic Model Outputs

Assessing the information on modelling submitted by the applicant 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 41

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.

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.

Please note trip generation set out in TA would only be accepted as a ‘pre-vision’ scenario when this is carried out.

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

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.

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.