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Highways and Transportation
Kroner House
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Ashford
TN24 8XU
Tel: 03000 418181
Date: 3 December 2025
Our Ref: AC

Application -	GB/20250993
Location -	Land Adjacent To, Longfield Road, Meopham, Gravesend Kent
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.

Thank you for your consultation in relation to the above planning application. I have the following comments to make with respect to highway matters:

Summary

Kent County Council Highways (KCC) has significant concerns regarding the sustainability and transport impacts of the proposed development of approximately 120 dwellings south of Longfield Road, Meopham. While the site is within walking distance of some local facilities, key issues include:

- **Sustainability:** Limited public transport provision, lack of safe and direct walking and cycling routes, and insufficient infrastructure to support modal shift away from private car use.
- **Access and Safety:** Existing speeds exceed limits; proposals for speed reduction and emergency access are incomplete. Off-site improvements to Longfield Road and the A227 are required.
- **Public Transport:** Bus services are infrequent and lack peak-time commuter options.
- **Walking and Cycling:** Deficiencies in local infrastructure, including lighting, cycle routes, and accessibility features. Proposed measures are inadequate.
- **Policy Compliance:** The application currently conflicts with NPPF requirements for sustainable transport and Gravesham Design Code principles.
- **Further Information Required:** Details on emergency access, off-site improvements, financial contributions, parking management, and modelling results.

Existing Access to the Site

Access is proposed to be taken from Longfield Road. Speed surveys indicate 85th percentile speeds currently exceed the 30 mph limit. Sections between Longfield Road and Meopham Station lack street lighting, and footway widths vary, with some narrow sections. Cyclists currently share the carriageway with motor vehicles, which is likely acceptable only to confident riders. This is evident in the Census data provided in the Travel Plan, which shows only 1% of people in the area currently cycle to work.

Access to Key Destinations

Table 8 of the Transport Assessment (TA) identifies walking distances to local facilities, including Meopham Community Academy at 550m from the site. Whilst the school is within an acceptable walking distance, its capacity for additional pupils is uncertain and should be clarified. If places are unavailable, residents may need to travel outside Meopham, likely by car due to limited cycling infrastructure and bus provision. Similar concerns apply to the medical centre and dentist. No supermarkets are listed, and weekly shopping at a convenience store is unlikely.

One of the key destinations for new residents is likely to be Meopham Station. Due to the lack of cycle infrastructure and lighting on the A227, the applicant proposes to direct cyclists to Tradescant Drive and Norwood Lane. The suitability of this route is questionable given that it is a 200m diversion from the A227, is not lit, and includes a PROW (public footpath) that prohibits cycle access. Requiring cyclists to dismount would be impractical and discriminatory, particularly for disabled cyclists who may struggle to do this. It is therefore likely that residents would want to stay on the direct route which is via the A227 and therefore cycle facilities should be provided. There is also a lack of cycle facilities and lighting on the A227 between the site and the secondary school.

Routes for pedestrians and cyclists should be direct, well-lit, and overlooked. While this may be achievable within the site, off-site routes lack sufficient infrastructure.

Walking and Cycling

A walking and cycling audit of the local area (Table 9 of the TA) highlights deficiencies such as an absence of cycle routes, inadequate lighting, cycle parking, wayfinding, shelter, rest areas, tactile paving at crossings and step-free access at Meopham Station, as well as inconsistent footway widths and surfacing. It does not specifically reference the lack of footway on approach to the station car park (which can be seen in 'View 14' in Appendix C), nor the lack of dropped kerbs across the Helen Allison school access. Proposed improvements include an uncontrolled crossing across Longfield Road, and financial contributions towards cycle parking at Meopham Station and Local Cycling and Walking Implementation Plan (LCWIP) Route 6. Additional improvements including dropped kerbs at the Helen Allison school access, and cycle facilities and lighting along Longfield Road and the A227 to Meopham Station and Secondary School, should be provided. Cycle parking should also be provided at Camer Parade.

A distance of 2km to Meopham Station is considered excessive for some residents, and therefore appropriate bus services and cycle facilities are required to facilitate trips to and from this key destination.

The KCC Public Rights of Way (PROW) team should be consulted on the PROW.

Bus Stops and Services

The site access is located within 500m of existing bus stops on Wrotham Road. This is already in excess of the generally recommended 400m distance, and residents would be travelling from further within the site to reach them. The stops serve three routes. Service 306 is believed to be a school service operating at full capacity. Services 308 (Sevenoaks) and 416 (Meopham) have limited frequency Monday to Saturday and no Sunday service. There is no commuter service during the AM peak and only one PM peak service at 17:36. Without enhancement, residents will have limited access to wider transport connections. Service 308 currently requires subsidy, indicating commercial unsustainability. The existing level of provision is inadequate for a development of this scale and must be improved. KCC seeks further discussion on this enhancement, in coordination with other sites coming forward.

Proposed Access

All mode access will be via a priority junction with Longfield Road and can be seen on plan 'Proposed Site Access with Visibility Splays' Ref 001 Rev D. There are no objections to the principle of this access, or the demonstrated visibility splays (although visibility splays for the crossings should also be provided).

However, there is concern that vehicles are currently travelling at 43-44mph past the site, within the 30mph zone. A change in roadside environment and relocation of the 30mph speed limit further west, is proposed, in order to help ensure that the speed limit is self-enforcing. However, the proposals are not shown. Access is not a reserved matter and these must be shown on the plan for further consideration, along with the appropriate forward visibility splay entering the 30mph zone from the west. Please note that vehicle activated signs are a maintenance liability for KCC and may be removed in future; the measures should be permanent and low maintenance.

An emergency access is required and needs to be shown on the plan. An additional footway / cycleway access to the eastern side of the site onto Longfield Road would increase permeability and reduce walking and cycling times for residents. One is indicated on the landscape plan but is not shown on the Site Access plan. An uncontrolled crossing is shown at the give way line of the site access. This should be relocated slightly further south so it is not on the radius. There is concern that the existing footway leading towards Wrotham Road is not to standard width and is reduced further by vehicles parking on the footway (see Route One View 3 in Appendix C). The proposed crossing of Longfield Road would permit residents to walk on the northern side of the carriageway to access Camer Parade. However, those travelling towards the schools would need to remain on the southern side and this is concerning.

A financial contribution is proposed to be provided towards cycling facilities at Meopham Station, and the Gravesham LCWIP Route 6. However, the proposed measures and the amount of contribution are not provided and are required.

No improvements are proposed to the A227 between the site and Meopham Station, or the site and Meopham Secondary School. These routes have narrow footways, intermittent lighting and no cycle facilities. As confirmed through speed surveys for the sister site – Land East of Wrotham Road, vehicles often travel in excess of the 30mph speed limit, making on carriageway cycling unattractive. Improvements are required to these routes.

The vehicle tracking shown on plan 002 Rev C is acceptable. Paragraph 6.15 of the Transport Assessment states "A swept path analysis of a fire tender has been undertaken through the emergency access." However, neither the emergency access nor the tracking of a fire appliance through it has been provided. This should be submitted for review and approval.

A Road Safety Audit was undertaken and the Designer's Response confirms that all recommendations have been addressed. However, access is not a reserved matter and therefore the lighting proposals for access to the site, raised in the audit and designers response, must form part of this Outline application.

Cycle and Vehicle Parking

Cycle parking will be provided on a one-per-bedroom basis, which is supported. Garden stores must allow direct access to the highway, and garages must be of a sufficient size to accommodate both a vehicle and a cycle. Ideally, cycle parking would be located at the front of the unit. Communal parking should include spaces for adapted bikes (approximately 5%), electric vehicle charging, and visitor parking.

At paragraphs 6.57 – 6.61 of the TA, the applicant proposes to provide additional offsite parking within the site to reduce the unlawful parking including footway parking, along Longfield Road. The parking is proposed to be allocated to Camer Parade or general unallocated parking for local schools. As the site is well within walking distance of the school and Camer Parade, new residents are unlikely to add to the on-street issue, and it is also considered to be too far from Camer Parade to be overflow parking for this facility. However, depending on location, the additional parking could help reduce footway parking along Longfield Road, which would enable new residents to access the school unimpeded, although there is concern that some of this parking is associated with the residential units rather than the school, and therefore is unlikely to use the new provision. Further information is to be provided regarding how pupils of the Helen Allison school access the school and could benefit from an off street drop off. Information related to how these spaces would be signed and managed is required.

Trip Generation and Junction Capacity Modelling

The development is anticipated to generate 62 two-way trips in the AM peak and 62 two-way trips in the PM peak. This is reasonable. However, strategic highway modelling has not yet been completed, preventing KCC from forming an opinion on the highway impact of the site, including the cumulative impacts with other Local Plan sites coming forward ahead of the Regulation 19 Local Plan consultation.

The traffic surveys showed the peak hours on the network are 08:00-0900 and 15:00-16:00. However, as the flows are similar to the typical PM peak hour (both of the network and the site - 17:00-18:00) the applicant proposes to assess the typical peak hour. The flow differences between the current and assessed PM peak hours should be set out within the forthcoming TA Addendum to justify this approach.

Initial local junction capacity modelling has been undertaken, although this will be updated following the results of the strategic modelling. Table 17 of the TA shows initial queue results for the A227 Wrotham Road / Longfield Road junction. The modelled queues are lower than the observed queues and this should be investigated prior to them being re-run in order to ensure the model is representative of existing conditions.

Table 18 shows the modelling results for the Longfield Road / Site Access junction. The results show the junction is anticipated to operate well within capacity during the peak hours. Table 19 shows the initial modelling results for the A227 Wrotham Road / Longfield Road junction. The results show the junction currently operates within capacity in both peak periods but is anticipated to operate above capacity in the '2030 Base' AM peak scenario onwards, as well as in the 2039 'With Development' PM peak scenario. Mitigation is likely to be required for this junction.

Please note, the table in Appendix K of the TA shows 350 units instead of 120, and should be revised accordingly to ensure the traffic generation is not overestimated. In addition, the model outputs in Appendix M show a start and finish time of 00:00 and 01:30 respectively for the site access, instead of the AM and PM peaks, and the geometry and flows for both junctions does not accord with that shown on plan 003 and in the turning movement diagrams. This should be corrected prior to re-running the models.

Travel Plan

The Travel Plan (TP) aims for a limited target of 5% reduction in car trips, which reinforces KCC concerns regarding sustainability.

Sustainable measures proposed to be provided include: a Car Club (including one year's free membership for residents and driving credit), public transport seasons tickets (although it does not state how long the season ticket would cover), parcel lockers, public transport timetable and

route information, active travel events and promotion, and signage along the route to the Station. These measures are supported. However, it is questioned whether a car club would be commercially successful in this location given the relatively low number of dwellings. Discussions with a car club operator should be undertaken to confirm.

The Travel Plan review should include information on the uptake of the public transport tickets and use of the car club.

With regard to the Action Plan at Table 6 of the TP, the timescale for the monitoring report should be “Within three months of the travel surveys being undertaken”.

The contact details of the Travel Plan Coordinator should be sent to KCC once they have been appointed: travelplans@kent.gov.uk.

Policy

The Gravesham Local Plan Regulation 19 consultation has not yet taken place and the application is therefore considered to be premature. A number of applications have recently been submitted in this area, but without an updated Local Plan in place the required infrastructure to cater for such a large cumulative increase in houses, cannot be coordinated, making it difficult for single sites to be acceptable based on what they alone can provide. Further discussions with KCC on a coordinated strategy are sought.

The Design for Gravesham Design Code, 2024 (Supplementary Planning Document) is not referenced in the TA. However, it provides confirmation that development in rural areas require appropriate sustainable infrastructure. Section 3.11 relates to the “Future for the rural areas?” and states “a. Promote a sustainable network of unique villages co-locating key community facilities and commercial activities and better connected by pedestrian and cycling routes and by excellent, cost-effective public transport” and “b. Improved pedestrian and cycling permeability throughout each village” .

A predict-and-provide approach has been undertaken rather than a vision-and-validate approach. This is contrary to policy. However, the proposals do provide a number of active travel measures to achieve a modal shift away from the private car.

With regard to the National Planning Policy Framework (NPPF), and in particular, policies 77 (suitable location), 115 (safe and sustainable access), 117 (safe sustainable transport for all, both internal and external to the site), 148 and 155 (sustainable locations required for green belt sites), the compliance of the proposal is questioned. Whilst the site is within walking distance of some local facilities, additional facilities (such as a supermarket) are likely to require a car to access them. The lack of high frequency bus services serving key destinations, the lack of cycle infrastructure and lighting along the A227 between the site and the station, is a contradiction of NPPF in that there is not a “genuine choice of transport modes” available. It is unclear how the Travel Plan will effectively encourage sustainable travel without the necessary off-site infrastructure and services to key local facilities such as Meopham Station, to support these modes. The proposed measures go some way to resolving this, but further measures to the local highway network and bus service, are required.

Conclusion

KCC would like to place a holding objection on the application until the above issues have been resolved.

It is important to note that Local Planning Authority (LPA) permission does not convey any approval to carry out works on or affecting the public highway.

Any changes to or affecting the public highway in Kent require the formal agreement of the Highway Authority, Kent County Council (KCC), and it should not be assumed that this will be a given because LPA planning permission has been granted.

For this reason, anyone considering works which may affect the public highway, including any highway-owned street furniture or landscape assets such as grass, shrubs and trees, is advised to engage with KCC Highways and Transportation at an early stage in the design process.

Across the county there are pieces of land next to private homes and gardens and near the highway that do not look like roads or pavements but are actually part of the public highway.

Some of this highway land is owned by Kent County Council whilst some is owned by third party owners. Irrespective of the ownership, this land may have 'highway rights' over the topsoil.

Works on private land may also affect the public highway. These include works to cellars, to retaining walls which support the highway or land above the highway, and to balconies, signs or other structures which project over the highway. Such works also require the approval of the Highway Authority.

Kent County Council has now introduced a pre-application advice service in addition to a full formal technical approval process for new or altered highway assets, with the aim of improving future maintainability. Further details are available on our website below:

<https://www.kent.gov.uk/roads-and-travel/highway-permits-and-licences/highways-permissions-and-technical-guidance>.

This process applies to all development works affecting the public highway other than applications for vehicle crossings, which are covered by a separate approval process. Further details on this are available on our website below:

<https://www.kent.gov.uk/roads-and-travel/highway-permits-and-licences/apply-for-a-dropped-kerb/dropped-kerb-contractor-information>

Once planning approval for any development has been granted by the LPA, it is the responsibility of the applicant to ensure that before development commences, all necessary highway approvals and consents have been obtained, and that the limits of the highway boundary have been clearly established, since failure to do so may result in enforcement action being taken by the Highway Authority.

The applicant must also ensure that the details shown on the approved plans agree in every aspect with those approved under the relevant legislation and common law. It is therefore important for the applicant to contact KCC Highways and Transportation to progress this aspect of the works prior to commencement on site.

Further guidance for applicants, including information about how to clarify the highway boundary and links to application forms for vehicular crossings and other highway matters, may be found on Kent County Council's website:

<https://www.kent.gov.uk/roads-and-travel/highway-permits-and-licences/highways-permissions-and-technical-guidance>.

Alternatively, KCC Highways and Transportation may be contacted by telephone: 03000 418181.

Yours faithfully

Director of Highways & Transportation

*This is a statutory technical response on behalf of KCC as Highway Authority. If you wish to make representations in relation to highways matters associated with the planning application under consideration, please make these directly to the Planning Authority.