



Gravesham Borough Council
Civic Centre
Windmill Street
Gravesend
Kent
DA12 1AU

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

Application -	GB/20250992
Location -	Land At, Wrotham Road, Meopham, Gravesend Kent
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.

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 350 dwellings east of Wrotham Road, Meopham. While the site is close to some local facilities, key issues include:

- **Sustainability:** Limited public transport provision, inadequate walking and cycling infrastructure, and insufficient measures to support modal shift away from private car use.
- **Access and Safety:** Existing speeds exceed limits; proposed access arrangements raise safety concerns and require further review.
- **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.
- **Policy Compliance:** The application conflicts with NPPF requirements for sustainable transport and Gravesham Design Code principles.
- **Further Information Required:** Details on emergency access, visibility splays, off-site improvements, financial contributions, and modelling results.

Existing Access to the Site

Access to the site is proposed to be taken from the A227 Wrotham Road, a strategic route connecting to the A2 in the north and the M20 in the south. The A227 is likely to accommodate a relatively significant number of HGVs, although the applicant should confirm the percentage from the survey data. Speed surveys indicate 85th percentile speeds 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 350m 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 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 reference the absence of cycle facilities at the convenience store (or the presence of steps) or the lack of footway on approach to the station car park (shown in 'View 14' in Appendix C). Proposed improvements include a 3m shared pedestrian/cycle route along the site boundary, uncontrolled crossings with refuges, footway widening, vegetation clearance, and financial contributions towards cycle parking at Meopham Station and Local Cycling and Walking Implementation Plan (LCWIP) Route 6. However, most measures focus on Route 1 (Green Lane to Longfield Road). Additional improvements, particularly a cycle route and lighting to Meopham Station, are required. Cycle parking should also be provided at Camer Parade.

Bus Stops and Services

Existing bus stops are located within walking distance of the site but only 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

Five pedestrian and cycle access points are proposed to be provided from the site (four on to the A227 including the emergency access, and one on to Green Lane). This level of permeability is welcomed. Vehicle access will be via a priority junction with a right-turn bay. The access proposals and proposed improvements to the A227 are shown on plan 'Proposed Site Access with Visibility Splays' Ref 001 Rev F. There are a number of issues that the proposals raise, and these are as follows:

- The site access junction is located within close proximity of existing driveways, which is concerning, particularly the driveway that appears to be located directly opposite the exit arm of the proposed access. This creates a direct conflict, particularly as the driver exiting the driveway will also be blocked by drivers in the right turn bay. The right turn bay could hold approximately 6 vehicles, which could cause significant delay to the existing residents waiting to emerge from the driveway. This may result in the residents trying to push their way through - not only causing potential conflicts with other vehicles in the right turn bay, but also being obscured from view from A227 northbound traffic by a vehicle in the right turn bay. This could result in collisions. Consideration should be given to relocating the vehicle access towards the southern end of the site.
- A continuous crossing is proposed across the site access bell mouth. However, the modelling results show there is significant delay (60 seconds) to the site access arm which could result in drivers sitting on the footway trying to force their way out / seeking gaps. The continuous footway is therefore unlikely to be appropriate in this particular location.
- The start of the hatching for the new right turn bay is very close to the Camer Parade exit. The modelling results show that there is likely to be a queue of one vehicle on Wrotham Road. Could the bay therefore be shortened slightly? The amendments would still need to meet the DMRB standard. The proposed hatching in this area is likely to be frequently over run and will wear away quickly.
- The pedestrian and cycle link to Green Lane in the north, referred to in the Design and Access Statement is not shown. As access is not a reserved matter, all pedestrian and cycle access points must be shown.
- The shared cycle facilities along the site boundary fronting the A227 Wrotham Road are welcome. However, please could the applicant confirm why this cannot be a segregated cycle route, for example, cyclists at carriageway level but segregated from the road with a kerbed edge?
- The amendment to the uncontrolled crossing point south of Longfield Road is acceptable in principle. However, it is questioned whether this reduced waiting area would cater for the demand during school drop off and pick up, and also whether this design has been considered in the context of the illegal parking which occurs on the A227 during school drop off and pick up. Consideration should be given to having the crossing area at carriageway level, while retaining the kerbed edge on the outer edge of the refuge.
- The provision of a new crossing point between the site and Camer Parade is welcomed. However, this should also accommodate cyclists. Have alternative crossing types been considered e.g. toucan crossing? This would provide a safer crossing, would remove the need for a refuge and could assist in naturally enforcing the 30mph speed limit. The A227 would need to have street lighting in order to meet standards.
- The 2m wide island running north / south parallel to Camer Parade is too close to the bus stop. Whilst tracking shows a car can pass a stationary bus, it is questioned whether a HGV could also make this manoeuvre.
- The available widths across the A227 are questioned as the dimensions conflict with those associated with the recent KCC scheme undertaken in this area. This needs to be reviewed.
- The removal of a parking bay is not ideal given the demand for parking in this area. However, if it allows for the provision of a safe crossing point then this may be acceptable. Any spaces removed from the shopping area should be re-provided within the site, within proximity to the new crossing, as suggested by the applicant.
- The proposed bus shelter is located where the back of the bus would be positioned, which could lead to the bus blocking the Camer Parade entrance. This should be relocated.
- An amended uncontrolled crossing is shown across the junction with Green Lane, but when crossing south to north, visibility is poor. Green Lane is signed as 'Not Suitable for

Heavy Goods Vehicles'. Has consideration therefore been given to narrowing the bell mouth (ensuring refuse vehicles still have appropriate access) and pulling the crossing further forward, reducing the crossing width and increasing visibility?

- It is unclear why the emergency access (south of Longfield Road) requires such a large bell mouth. This takes pedestrians and cyclists significantly away from the desire line. As this access would only be used in an emergency, it is questioned why this would not be a crossover. The transition to allow cyclists to enter / leave the shared route, is welcomed.
- It is unclear why cyclists travelling northbound would need to exit the carriageway south of Longfield Road, to cross over the A227, when they could enter the shared route further south (near the emergency access).
- For sites over 300 units, a secondary access is usually required but has not been provided. Justification for this omission is required.
- Paragraph 6.31 of the TA states "Visibility splays from the access junction are provided within Drawing T25512.001 Rev F". However, these are not shown on the plan. Visibility splays for the access points (including where pedestrian routes emerge onto a cycle route) and all proposed crossings (forward visibility and visibility for pedestrians/cyclists) must be provided so they can be reviewed and conditioned to any permission granted.

The applicant must reinstate any kerbs where changes have been made e.g. on the islands. It is assumed that no highway trees would be removed for the proposals but please can the applicant confirm? KCC do not usually permit the removal of existing healthy trees.

The vehicle tracking shown on plans T25512.002 Rev E, T25512.003 and T25512.002.01 Rev A will need to be re-run following removal of the continuous crossing at the access.

A Road Safety Audit was undertaken and the Designer's Response confirms that all recommendations have been addressed.

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 bike charging, and visitor parking.

Paragraph 4.25 of the TA relates to engagement with the Parish Council and states "Concerns were raised regarding local traffic and parking issues associated within the school pick-up and drop-off periods on local roads, as well as on Camer Parade." A parking assessment of the existing local highway was undertaken by the applicant and confirms that "Across the school drop-off and pick-up periods, parking on the local road network and parking areas increases closer to the school start/finish times before dropping back to a 'typical' level". As a result, the applicant proposes to provide some parking bays within the site which would either be solely allocated to facilities on Camer Parade or unallocated parking for general use. As the site is well within walking distance of the school and Camer Parade, new residents are unlikely to add to this on-street issue. Providing additional parking for these facilities is therefore not required to make the proposal acceptable in planning, and could have a negative impact by encouraging more car-based trips to the area at a time when policy requires encouragement of walking and cycling to local facilities. However, should any parking bays need to be removed at Camer Parade to enable delivery of a safe crossing, these could be re-provided within the site, adjacent to the crossing. 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 179 two-way trips in the AM peak and 182 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 A227 Wrotham Road / Site Access junction. The results show the junction is anticipated to operate well within capacity during the peak hours, although it is noted that the delay to the site access arm is 60 seconds in the AM peak. This is a significant delay and there is concern that this would encourage drivers to pull out without waiting for a reasonable gap in traffic.

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. The modelling outputs for this junction are not included in the appendices for review and should be included in the forthcoming TA Addendum.

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, and active travel events and promotion. These measures are supported.

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 (along with the planning application reference number) 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.