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Highways and Transportation
Kroner House
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Ashford
TN24 8XU
Tel: 03000 418181
Date: 10 July 2026
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 re-consultation in relation to the above planning application. Kent County Council Highways (KCC) has the following comments to make with respect to highway matters:

Proposed Site Access

All mode access will be from the A227, with two additional pedestrian and cycle access points provided along the A227 and Green Lane, and an emergency, pedestrian and cycle access provided along the A227. A 3m shared cycle route will be provided along the boundary with the A227, and continuous crossings will be provided at the site access and emergency access. The access proposals and proposed improvements to the A227 and Green Lane are shown on plans 'Proposed Site Access with Visibility Splays 01' Ref T25512 001 Rev G and 'Proposed Site Access with Visibility Splays 02' T25512 001.01 and are generally acceptable.

The previously proposed uncontrolled crossing across the A227 between the site and Camer Parade has now been upgraded to a toucan. This is welcomed. The applicant will be required to install street lighting in this location as part of the works. The parking space to be removed in order to provide the build out is to be replaced within the site.

With regard to Green Lane, the raised table may require additional lighting in this location.

As requested by KCC, tracking of a HGV passing a waiting bus at the northbound Camer Parade bus stop has been provided and can be seen on plan T25512 002.01 Rev B. This is acceptable.

The uncontrolled crossing south of Longfield Road is now proposed to remain in its current location but the tactiles will be amended to be cycling compliant.

Issues that require the plans to be updated, but could be resolved during detailed design if necessary:

- It is unclear why dropped kerbs and tactile paving have been proposed on the minor arm of the site access and the emergency access, when the continuous footway already gives pedestrians priority.
- A short section of shared route is proposed on the western side of the A227 to facilitate cyclists crossing the A227 itself. A dropped kerb is required to allow cyclists to egress the carriageway.
- With regard to the proposed toucan crossing, unless the land owner approves tactile paving on the northern side of the Camer Parade access road, the proposed build out should not contain the buff tactiles as there would be no 'landing' tactiles on the northern side. A 'cyclist dismount' sign should also not be used as some disabled cyclists are unable to do so. Cyclists can access / egress onto the Camer Parade access road.

Visibility Splays

Visibility splays are shown on the 'Proposed Site Access with Visibility Splays 01' plan, Ref T25512 001 Rev G, 'Proposed Site Access with Visibility Splays 02' plan, Ref T25512 001.01 and 'Pedestrian / Cyclist Visibility Splays at Crossing Points' plan Ref T25512 005. However, some of the splays are shown incorrectly. For example, the site access x splay should be shown 2.4m back from the first give way line (east of the continuous crossing) as this is the position of waiting vehicles before they emerge onto the A227. Some of the splays are shown to terminate within the footway, but these can be taken to the edge of the nearside carriageway, which should offset the revised x distance.

A 59m splay is shown for the south to north crossing of Green Lane at the A227 / Green Lane junction. The vegetation within this splay must be cut back (without removing highway trees) to ensure it is achieved. Given how quickly vegetation can grow and obscure the visibility, it is suggested that the crossing is moved closer towards the A227. Whilst this slightly lengthens the crossing time, it would retain pedestrians closer to the desire line whilst maximising visibility. The applicant has also request KCC consideration of a priority crossing at this junction; however, KCC does not consider this to be appropriate. The forward visibility to the raised table at the Green Lane / Tradescant Drive junction should be shown, to confirm it is achievable. The splays requested by KCC are likely to be achievable but need to be shown so they can be conditioned.

Walking and Cycling

In addition to the access proposals noted in the previous section, the walking and cycling proposals include:

- The widening of the existing footway between Camer Parade and Wrotham Road from 1.5m to 2m to allow for suitable pedestrian access to the northbound bus stop. Confirmation is sought that the 0.5m was taken from the A227 carriageway not Camer Parade.
- General vegetation clearance along Wrotham Road south (Route 4) to increase useable width of footways.
- Provision of 10 additional cycle parking stands at Meopham railway station to make cycling a more attractive method of travel to the station.
- Provision of tactile paving across Green Lane, Huntingfield Road, Pine Rise, Norwood Lane, St John's access road, Shipley Hills Road, and The Street.
- A proportionate contribution towards improved lighting along the A227 corridor between the site (including the toucan crossing) and Meopham Station, to improve the attractiveness of the route for pedestrians and cyclists.
- A proportionate contribution towards additional signage along the A227 corridor between the site and Meopham railway station.

The above proposals are generally acceptable. However, KCC require the lighting strategy and signage strategy to be secured by condition and implemented by the applicant, rather than securing a financial contribution for design and implementation by KCC.

Existing conditions on the A227 corridor are characterised by recorded vehicle speeds above the posted speed limit, limited street lighting, narrow footways and the absence of dedicated cycle infrastructure. Whilst some residents may currently choose to cycle on-carriageway, the route is unlikely to be attractive to anyone other than confident cyclists. The proposed development would increase demand for travel between the site, Meopham Station, Meopham Secondary School and other destinations served by the corridor.

KCC and Gravesham Borough Council are currently progressing a strategic cycle route proposal between Istead Rise, Meopham Station and Meopham Secondary School. A proportionate financial contribution towards the design and implementation of this route is considered necessary to make the development acceptable in planning terms. The route would directly benefit future residents of the development by improving access to key destinations and by providing an attractive alternative to private car use. The contribution is directly related to the development and fairly and reasonably related in scale and kind, reflecting the development's proportionate reliance on the A227 corridor and the infrastructure necessary to support the modal shift objectives contained within national and local transport policy.

At paragraph 6.100 of the Transport Assessment (TA) the applicant confirms agreement to providing a proportionate contribution to this scheme.

In response to KCC's request to provide cycle parking at Camer Parade, the applicant states there does not appear to be a suitable location, or space, on the parade that would facilitate this. This is disappointing and the Travel Plan Coordinator should continue to investigate opportunities to include cycle parking provision in this location.

With regard to KCC's request to segregate the proposed cycle route along the site boundary with the A227, the applicant states this cannot be achieved due to the presence of trees. This is disappointing. It is questioned whether the cycle route could be provided on the eastern side of the tree line, although this would need to be overlooked and not deviate from the desire line otherwise this may significantly reduce its attractiveness.

Bus Stops and Services

The existing level of bus provision along the A227 corridor is insufficient to support the site proposals. The current service offer does not provide a genuine alternative to the private car for many journeys, particularly given the limited commuter-period and evening service, limited school-time capacity and the reliance of the existing service on KCC financial support. The proposed development would generate additional demand for travel along this corridor and therefore increase the need for enhanced public transport provision. Without mitigation, future occupiers would have limited realistic alternatives to private car use for many journeys and the development would therefore conflict with the objectives of NPPF paragraphs 110, 115, 117 and 118. A proportionate contribution towards improvements to local bus services is therefore considered necessary to make the development acceptable in planning terms. The contribution is directly related to the development because future residents will rely on services operating within this corridor to access key destinations, and is fairly and reasonably related in scale and kind as it reflects the site's proportionate impact within the wider transport strategy for the area.

At paragraph 6.77 of the TA, the applicant confirms agreement to provide this contribution, and also proposes to provide a six-month bus ticket to each dwelling upon initial occupation,

to promote the use of local bus services and help develop a culture of sustainable travel from the outset. This is welcomed.

The 'Proposed Site Access with Visibility Splays 01' plan, Ref T25512 001 Rev G annotations state that new bus shelters, flagpoles, timetables and real time information will be provided at the Camer Parade (northbound) and Wrotham Road (southbound) bus stops. However, the annotation also states one tree will need to be removed to accommodate the design at the southbound bus stop. KCC do not generally permit removal of trees and where they do, it can incur significant financial penalties. The bus shelter also appears to be too close to the carriageway to allow wheelchair or pram access. The design should be amended to avoid the tree removal and to provide sufficient room for passengers to board / alight. It is acknowledged that this is likely to result in a short pinch point along the route.

With regard to the proposed bus shelter at the northbound stop outside Camer Parade, whilst the principle is welcomed, it is again considered that the stop is located too close to the carriageway. Not only would this prevent passengers accessing the shelter from the front, it is likely to be damaged by passing vehicles. The design should be amended, or the bus shelter proposal may need to be removed.

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. In line with paragraph 6.65 of the TA, garages will be of a sufficient size to accommodate both a vehicle and a cycle (where appropriate) and communal parking will include spaces for adapted bikes (approximately 5%), electric bike charging, and visitor parking.

Vehicle parking will be provided in line with appropriate standards. Electric vehicle charging facilities will be provided. This should be in line with the Building Regulations.

At paragraph 6.116, the TA states that a number of parking spaces will be provided within the site to help manage existing demand at Camer Parade and the primary school, and that the number of spaces and details will be addressed at the reserved matters stage. For clarity, other than the single space to be lost at Camer Parade for the toucan crossing, providing additional parking for these facilities is not required to make the proposal acceptable in planning. Whilst KCC would not object to some parking being provided, this should be proportionate in order not to encourage more trips by car. This requires further consideration at reserved matters application stage to ensure the number of spaces and the design are appropriate.

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 considered a reasonable estimation of trip generation given the proposed number of dwellings

As requested, the applicant has undertaken strategic modelling using the Kent Transport Model, then local junction modelling for junctions likely to experience an increase of 30+ vehicles during the peak hours. The following 13 local road junctions have been assessed for capacity:

- Junction 1 - Wrotham Road/Site Access
- Junction 2 - Longfield Road/Site Access
- Junction 3 - Wrotham Road/Longfield Road
- Junction 4 - Wrotham Road/Green Lane
- Junction 5 - Wrotham Road/Huntingfield Road

- Junction 6 – Wrotham Road/Lewis Road
- Junction 7 - Wrotham Road/Istead Rise
- Junction 8 - Wrotham Road/A2 (Double Roundabout)
- Junction 9 – Green Lane/Norwood Lane
- Junction 10 - Sole Street/The Street
- Junction 11 -Longfield Road/Huntingfield Road
- Junction 12 – Main Road/Manor Road
- Junction 13 – Main Road/Nurstead Lane

The junction models have been tested using the following scenarios:

- 2032 Reference Case (Assumed Opening Year)
- 2032 Reference Case + Development (Site 1)
- 2032 Reference Case + Site 1 + Site 2 (GB/20250993 south of Longfield Road) - Sensitivity Assessment
- 2042 Local Plan
- 2042 Local Plan + Development (Site 1)
- 2042 Local Plan + Site 1 + Site 2 (GB/20250993 south of Longfield Road) - Sensitivity Assessment

Please note that all scenarios are based on Galley Hill Road being closed, as this represents a worst-case scenario in the event that the necessary Government funding is not provided to KCC to implement a scheme to reopen the route.

It is questioned why a '2025 Base' scenario has not been provided for review. This is standard practice to ensure the models accurately reflect the existing situation.

The applicant's modelling using the Kent Transport Model assumes Norwood Lane is closed to vehicular traffic (excluding emergency vehicles), which is based on the proposals for application GB/20260207 (Land north of Camer Road). However, the application has not yet been determined so this is not a committed scheme. The inclusion of the closure results in a robust assumption of the A227 / Green Lane junction as all traffic which would travel through Norwood Lane would now use Green Lane. However, given the predicted queues at the Green Lane junction, should the closure of Norwood Lane not be approved, it is questioned whether some rat running along Norwood Lane would occur and therefore whether the A227 / Norwood Lane would still operate within capacity. An assessment of this junction should be undertaken to confirm.

It is understood that National Highways have provided further detailed comments on the modelling of the A2 / A227 junction and the proposed mitigation scheme for the Wrotham Road (south) arm which can be seen on plan T25512.SK002 and which includes an extended flare, changes to the saturation flows, phase delays and hatching. It is noted that the proposed mitigation scheme includes the 'final' mitigation committed scheme approved under application GBC/20141214 (Land at Coldharbour Road) and varied by GB/20141214. However, this has not yet been delivered and this application would therefore be subject to a Grampian condition, preventing occupation until the third party scheme has been delivered. Clarification is required regarding the anticipated delivery programme for the third party mitigation scheme.

Some of the comments made by National Highways are echoed by KCC, mainly those related to the applicant's proposed mitigation. The Road Safety Audit should be updated to include the mitigation proposals at the A2 / Wrotham Road junction, once comments have been addressed. There are also concerns that even with the proposed mitigation, the Wrotham Road south arm would experience an additional queue of 48 between the '2042 Local Plan +

Committed Development' and '2042 Local Plan + Committed Development + Site 1' scenarios, although it is recognised that the Local Plan is not yet adopted and that the difference between the '2032 Reference Case + Committed Development' and '2032 Reference Case + Committed Development + Site 1' scenarios is only 10 vehicles on this arm.

KCC awaits the outcome of the discussions before commenting further.

Travel Plan

In addition to those already set out within this response, sustainable measures proposed to be provided include an on-site mobility hub including parcel lockers and cycle parking, provision of a Travel Information Pack for each household upon first occupation, distribution of travel information such as walking and cycling maps, and hosting active travel events. These measures are supported.

The monitoring of the Travel Plan must include vehicle surveys at the site access and this should be set out within the Full Travel Plan (to be secured by condition).

The Travel Plan Coordinator should continue to investigate opportunities to provide cycle parking provision at Camer Parade, including seeking agreement with the land owners.

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.

Conclusion

KCC would like to place a holding objection on the application until the above issues have been resolved. However, should the Local Planning Authority positively determine the application prior to this information being submitted and reviewed, KCC requests that the following conditions and obligations be secured:

Draft Conditions / S106 Obligations

- The site access points and off-site highway works shown on plans T25512.001 Rev G and T25512 001.01 shall be constructed and available for use prior to first occupation of the site. All access points should thereafter be retained and remain available for use in perpetuity.
- Prior to first occupation of the site, vehicle, pedestrian and cycle visibility splays within the applicant's control shown on plans T25512.001 Rev G, T25512.001.01 and T25512 005 shall be provided and thereafter maintained with no obstruction exceeding 0.6 metres in height.
- Bus shelters (inclusion subject to detailed design), flagpole, seating and real-time journey information shall be provided at the northbound (Camer Parade) and southbound (south of Camer Parade) bus stops prior to first occupation.
- A financial contribution of £2,648 per dwelling (index linked) shall be paid to Kent County Council prior to first occupation of the site towards the enhancement of the local bus services. The contribution shall be subject to proportionate reduction where other suitable non-Local Plan sites secure planning permission and make appropriate financial contributions towards the same public transport corridor, secured through a Section 106 agreement. In the event that the 308 (or replacement) is still financially supported by KCC through Government funding at the time the trigger is reached, the funding may be reduced to £1,777 per dwelling (index lined).
- A six-month local bus ticket to be provided to each household upon first occupation. The ticket should be advertised to new residents and should be available for take up for up to one-year post first occupation of the associated unit.

- A per-dwelling financial contribution to be paid to KCC prior to first occupation of the site, towards the design and implementation of the strategic A227 cycle route between Istead Rise, Mepoham Station and Meopham Secondary School (or alternative active travel infrastructure such as LCWIP Route 6, should the scope of the scheme evolve through the detailed design process), in order to increase the attractiveness of this mode and reduce reliance on the private car. The contribution amount shall be confirmed through the Section 106 agreement.
- A signage strategy for the A227 between the site and Meopham Station to be submitted to and agreed by the Local Planning Authority prior to commencement of the site, and installation prior to first occupation (unless already implemented, or due for implementation imminently), by third parties.
- A lighting strategy for the A227 between (and including) the toucan crossing and Meopham Station, and the Green Lane raised table, to be submitted to and agreed by the Local Planning Authority prior to commencement of the site, and installation prior to first occupation (unless already implemented, or due for implementation imminently), by third parties.
- 10 additional cycle parking stands to be provided at Meopham Station (subject to agreement with Network Rail and the station operator), prior to first occupation.
- Provision of tactile paving across Green Lane, Huntingfield Road, Pine Rise, Norwood Lane, St John's access road, Shipley Hills Road, and The Street.
- Further design regarding the A2 / A227 southern junction mitigation scheme shown on plan T25512.SK002, prior to commencement of the scheme, and implementation of the agreed scheme prior to first occupation. The site must not be occupied until the mitigation scheme committed under application GBC/20141214 (Land at Coldharbour Road) and varied by GB/20141214, has also been delivered.
- A Full Travel Plan, prepared in accordance with the Framework Travel Plan and including a methodology for annual vehicular traffic counts at the site access and mitigation measures should the annual targets not be achieved, shall be submitted to and approved by the Local Planning Authority prior to first occupation of the site. The Travel Plan, to be implemented on first occupation, must be monitored for a minimum of five years.
- A KCC Travel Plan monitoring fee of £1,422 shall be paid to KCC prior to the first Travel Plan monitoring period.
- A minimum of one cycle parking space per bedroom.
- Electric vehicle charging provision to be provided in line with Building Regulations.
- A Construction Management Plan to be submitted to and approved by the Local Planning Authority prior to commencement of development, and shall include, as a minimum:
 - a) Routing of construction and delivery vehicles to / from the site (tracking may be required)
 - b) Details of the parking and turning areas for construction and delivery vehicles and site personnel
 - c) Timing of deliveries (avoiding network and school peak hours where possible)
 - d) Provision of wheel washing facilities
 - e) Provision of measures to prevent the discharge of surface water onto the highway
 - f) Details of any temporary traffic management / signage required.

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.