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Highways and Transportation
Kroner House
Eurogate Business Park
Ashford
TN24 8XU
Tel: 03000 418181
Date: 5 May 2026
Our Ref: AC

Application -	GB/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 works

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:

Walking and Cycling

With reference to KCC's previous comments regarding barriers to cycling on the A227, the applicant acknowledges that *"there is limited cycle infrastructure within the vicinity of the site,"* and that *"along the busier roads such as Green Lane and the A227 Wrotham Road, cycling on-street could restrict those that are not comfortable cyclists."* The proposal therefore relies on existing conditions which do not provide an attractive or inclusive environment for cycling and, as submitted, does not fully align with paragraphs 110 and 111 of the National Planning Policy Framework (NPPF), which require development to prioritise walking and cycling and reduce reliance on the private car.

KCC, working with Gravesham Borough Council (GBC), has been developing a strategic cycle route proposal along the A227 corridor between (i) Istead Rise and Meopham Station and (ii) Meopham Station and Meopham Secondary School, in order to help provide safe, convenient and attractive active-travel routes to support everyday journeys. The proposed development would increase the number of trips seeking to use this corridor, including journeys to schools and local facilities, thereby increasing the need for higher-quality cycling provision.

A per-dwelling financial contribution towards the design and delivery of the A227 cycle route is therefore necessary to make the development acceptable in planning terms, as it would help to address identified shortcomings in the local cycle network relevant to trips generated by the development; is directly related to the site, given the reliance of future residents on the A227 corridor to access key destinations; and is fairly and reasonably related in scale and kind, as it would contribute proportionately to infrastructure required to enable a mode shift away from private car use in accordance with the National Planning Policy Framework (NPPF) paragraphs 110, 115 and 117.

Public Transport

The note refers to KCC's request for enhancements to the 308 service to accommodate new development and states *"The Applicant wishes to engage in further discussions with both KCC and GBC on this matter, as part of the development of a s106 agreement."* The 308 bus service is currently infrequent and does not provide services during the AM peak period, which is a critical time for commuter and school-related travel. Consequently, for some key destinations outside of the immediate area, the private car remains the only realistic option. The site therefore does not currently offer a genuine choice of transport modes, contrary to paragraph 110 of the NPPF.

In addition to the 308, KCC's public transport request noted that whilst some children attend the Meopham Secondary school, there are significant flows of children to schools located in Gravesend as well as to schools in Longfield, Wrotham and further afield, and that the majority of the buses are believed to be running at full capacity. The existing situation is therefore in conflict with the applicant's Vision 1 trip generation scenario which assumes *"all car-based education trips are shifted to active and sustainable travel modes given the proximity to education facilities and the proposed pedestrian improvements along these routes, as well as the range of school bus services available within Meopham."*

Investment of approximately £3.8 million is required to enhance the 308 service and local school services to a level that would represent a credible alternative to the private car and help address the policy conflict identified above. This equates to an indicative contribution of £3,502 per dwelling, based on the 1,055 dwellings proposed along the wider A227 corridor in the draft Local Plan, and the uplift in units at this site to 150. This contribution could be reduced if other sites obtain planning permission in the short term and a proportionate contribution is secured, ensuring that mitigation remains fairly and reasonably related in scale and kind.

Vehicle Access

The Site Access Arrangements Plan in the Transport Assessment (ITL16459-GA-01 Rev C) has now been updated to ITL16459-GA-006 Rev E and now also shows lighting (type to be determined) along Green Lane, and improvements at the Camer Park Road entrance. In order to help naturally reduce speeds to 30mph, the applicant proposes to introduce some red surfacing at the point of change between 30mph and the derestricted limit. This is welcomed.

Should the live planning application on the eastern side of Norwood Lane obtain planning permission (GBC/20260207), part of Norwood Lane would become an active travel corridor, reducing vehicle movements along the southern section. Should that application not be granted permission, or the works to Norwood Lane are not planned to come forward within the near future at the time of occupation of this application, then it is requested that the applicant introduce carriageway surface markings at the emergency access, to alert drivers to the fact that pedestrians and cyclist will be entering and leaving this site and to slow vehicles down to enhance safety. The details can be determined at reserved matters application stage.

The 85th percentile speeds are stated as 35.2mph westbound and 37.7mph eastbound. Whilst the speed limit is proposed to be reduced to 30mph (and therefore only require splays of 43 metres), visibility splays of 54 metres to the east and 59 metres to the west (in accordance with the current 85th percentile speeds) are shown on plan ITL16459-GA-006 Rev E and are acceptable.

The note confirms that there will be no loss of highway trees required for the access proposals and this is welcomed.

The applicant has not provided an additional pedestrian and cycle access onto Norwood Lane towards the centre of the site, as requested. This is disappointing, especially given the fact

that the adjacent site (GBC/20260207) has a live planning application and proposes to provide a school and local facilities which will be a destination point for new residents of this site.

With regard to improvements at the Green Lane / A227 junction, the applicant has not liaised with the applicant of the adjacent site (GB/20250992), as requested. This is disappointing. The applicant states that *“any other development proposal near to this site, does not conflict or prejudice the highway works either proposal is seeking to bring forward (such as the application to the south of this site).”*

Trip Generation and Distribution

In response to KCC's query regarding trip rates, the applicant has provided a comparison of the proposed trip rates (derived from TEMPro) with those of the Kent Transport Model (KTM). The figures shown are generally aligned and the trip rates are considered acceptable.

The turning movement diagrams have been corrected and this is welcomed.

The applicant has undertaken further modelling work as requested. Three junctions have been modelled for capacity using industry standard software for the future '2030' scenario: A227 / Green Lane, A227 / Longfield Road and Jeskyns Road / Sole Street / The Street.

The modelling outputs show all three junctions are anticipated to operate within theoretical capacity in all future scenarios. The A227 / Green Lane junction is anticipated to operate above desirable capacity during the AM peak, at 0.96 RFC and with a queue of nine vehicles. The applicant has confirmed this occurs for only one 15-minute section of the modelled hour, with the remaining 45 minutes operating within desirable capacity.

It is noted that the model uses a future year of 2030 and not the requested 2042, which aligns with the draft Local Plan. Ideally the modelling should be updated to assess 2042 conditions. However, it is acknowledged that the majority of the growth to 2042 will have been modelled within the KTM and that the turning movements extracted from the KTM and subsequently modelled indicate that the junctions would continue to operate within capacity.

Summary and Conclusion

In terms of sustainability, the site is not ideally located, and access to services and facilities by walking, cycling and public transport is currently limited. In the absence of mitigation, the site would be highly car-reliant. However, on balance, KCC Highways considers that, subject to the securing of appropriate mitigation, these constraints do not warrant an objection on transport grounds.

The site's inclusion within the draft Local Plan, the proposed off-site highway improvements, and subject to GBC securing appropriate financial contributions towards enhanced public transport and strategic cycling improvements, collectively weigh in favour of acceptability. KCC Highways therefore has no further objection to the application.

Planning Conditions and Section 106 Obligations

- The site access points and off-site highway works shown on plans ITL16459-GA-006 Rev E, ITL16459-GA-007 Rev D and ITL16459-GA-015 shall be implemented prior to first occupation of the site. The site access and emergency / pedestrian and cycle access should thereafter be retained and remain available for use in perpetuity. Any associated Traffic Regulation Order applications shall be submitted to KCC by and funded by the applicant.
- Prior to first occupation of the site, visibility splays of 59 metres (west) and 54 metres (east) at the site access, as shown on plan ITL16459-GA-006 Rev E, shall be provided and thereafter maintained with no obstruction exceeding 1.05 metres in height.

- Prior to first occupation of the site, visibility splays of 43 metres (west and east) at the emergency / pedestrian and cycle access, as shown on plan ITL16459-GA-015, shall be provided and thereafter maintained with no obstruction exceeding 0.6 metres in height.
- A financial contribution of £3,502 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.
- A per-dwelling financial contribution to be paid to KCC prior to first occupation of the site, towards the design and implementation of a cycle route between (i) Istead Rise and Meopham Station and (ii) Meopham Station to Meopham Secondary School, 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 Full Travel Plan, prepared in accordance with the Framework Travel Plan and KCC's previous comments, 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, should include such things as traffic generation targets (based on the traffic generation outlined within the Transport Assessment), detailed annual monitoring methodology (monitoring to occur annually for a minimum of five years), and mitigation measures should the annual targets not be achieved.
- A KCC Travel Plan monitoring fee of £1,422 shall be paid to KCC prior to the first Travel Plan monitoring period.
- 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.