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Highways and Transportation
Kroner House
Eurogate Business Park
Ashford
TN24 8XU
Tel: 03000 418181
Date: 20 May 2026
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 re-consultation in relation to the above planning application. KCC Highways (KCC) has the following comments to make with respect to highway matters:

Crash Data

The crash data assessment within the Updated Transport Assessment (UTA) covers the period October 2019 to September 2024, resulting in the omission of over a year's worth of data. A review of the most recent data available to KCC indicates that there have been no recorded injury collisions on Longfield Road within this omitted period. However, two 'slight' collisions occurred at the Longfield Road / A227 Wrotham Road junction, and two 'serious' collisions occurred on the A227 Wrotham Road between Longfield Road and Melliker Lane (within 750 m of the Longfield Road / A227 Wrotham Road junction). The latter two collisions both involved vulnerable road users (a pedestrian and a motorcyclist) and, together with other incidents identified within the assessment involving vulnerable road users, may be indicative of the wider road environment along the A227 corridor, which prioritises vehicular movement and offers limited provision for pedestrians and cyclists.

Walking, Cycling and Public Transport

The site is located approximately 2 km from Meopham Station (which is beyond a comfortable walking distance for many users), and is poorly served by public transport, with bus stops located over 400 m from parts of the site, limited service frequency, no Sunday provision, and no effective AM peak commuter service. The 308 bus service also requires KCC financial subsidy and is therefore at risk of removal should future funding not be secured. Without enhancement, future residents would have limited realistic alternatives to private car use.

In addition, the A227 corridor, which provides the primary connection to key local destinations, is characterised by high traffic volumes, recorded vehicle speeds above the posted limit, limited street lighting, narrow footways and an absence of dedicated cycling infrastructure. The applicant's own evidence demonstrates very low 'attractiveness' ratings in the Walking and Cycling Audit (17–33%), indicating that existing routes are not attractive and are unsuitable for users of all abilities. This is further evidenced by the recorded personal injury collisions.

KCC therefore welcomes the applicant's proposals and agreement to provide essential mitigation in the form of proportionate financial contributions towards the enhancement of local bus services (including a six-month season ticket proposed by the applicant), walking and cycling improvements on the A227 (or LCWIP Route 6), and wayfinding.

In addition to the above financial contributions, the applicant proposes to provide a two-metre footway along the site boundary with Longfield Road and an uncontrolled crossing over Longfield Road, east of the site. However, dropped kerbs are also required across the Helen Allison School access to ensure accessibility and continuity of the pedestrian route.

The Illustrative Development Framework Plan (Appendix F) and the Parameter Plan indicate an additional pedestrian and cycle access to the north-west of the emergency access. However, this connection is not shown on the Site Access Plan. Should this form part of the access strategy, the Access Plan should be updated to clearly reflect all proposed points of connection to the highway network. If cyclists are permitted to use this access, a dropped kerb will be required to access and egress the carriageway and appropriate visibility splays will be required. It is questioned whether appropriate splays are achievable given the requirements of DMRB for high speed roads.

In this context, it is also noted that the red line boundary along the western site frontage does not appear to include the existing footway. Clarification is required for its omission. If no constraint exists, the applicant should extend the proposed two-metre footway along the full site frontage to provide a continuous, compliant pedestrian route linking the site access, emergency access and the additional pedestrian/cycle connection. This approach would improve permeability for non-motorised users and could also contribute to a change in the character of Longfield Road at this location, supporting the proposed speed reduction measures through increased visual enclosure and frontage activity.

At paragraph 6.56 of the UTA the applicant proposes to fund an additional ten cycle parking spaces at Meopham Station to further encourage cycling. This is welcomed. However, this must be discussed with Network Rail, who would receive the contribution / install the stands. The stands should be covered, secure and located in a convenient and well-overlooked position.

The applicant also proposes to enhance lighting along the A227 to improve the attractiveness of this route. However, in line with the recommendations from the Safety Auditor, as accepted by the applicant in the Designer's Response (Appendix H of the UTA), lighting along Longfield Road must also be provided. The applicant proposes this as a financial contribution; however, KCC requires a condition securing a lighting strategy, with the works to be delivered by the applicant under a Section 278 agreement (unless otherwise agreed with KCC due to the wider coordinated cycle scheme on the A227).

Vehicle Access

The updated site access proposals are shown on drawing 'Proposed Site Access with Visibility Splays' (T25526-001 Rev E).

The access has been relocated 10 metres west in order to avoid conflicts with parked vehicles on the opposite side of Longfield Road. This is welcomed.

The emergency access is now shown on the plan. However, this should be provided in the form of a vehicle crossover rather than a bellmouth junction, with the footway continuing across the crossover to give priority to pedestrians. A bollard should be shown on the plan, preventing general vehicular access whilst permitting pedestrian and cycle movements.

In response to observed vehicular speeds along Longfield Road being in excess of 30 mph, and in line with the recommendations from the Road Safety Auditor (Appendix H of the UTA), the applicant proposes to extend the 30 mph speed limit further west and introduce a gateway feature to indicate entry into a lower speed environment. The plan indicates that the gateway feature will include 'dragon's teeth'. However, KCC does not generally support the use of dragon's teeth on the highway. Alternative measures, such as virtual carriageway narrowing using edge of carriageway markings, red surfacing, speed roundel markings (within the 30 mph section), and appropriate terminal signage, should be considered as alternatives.

At paragraph 6.75 of the UTA the applicant proposes to provide contributions towards wayfinding signage along the A227 between the site and Meopham Station. This is welcomed, however, this should be implemented by the applicant.

The swept paths of a refuse vehicle and fire tender travelling through the emergency access have been provided on drawing T25526-004 and are considered acceptable.

Visibility Splays

The visibility splays are shown on drawing 'Proposed Site Access with Visibility Splays' (T25526-001 Rev E).

The forward visibility relating to the change in speed limit is incorrect and should be measured for vehicles approaching from the west, travelling towards the 30 mph zone, rather than from the east as currently shown on the plan. The required distance should be based on the DMRB stopping sight distance appropriate to a derestricted road. In accordance with this guidance, and having regard to the presence of a slight crest in the vertical alignment to the west, the applicant should update the visibility plans and demonstrate that the required sight distance is achieved with an unobstructed line of sight in both the horizontal and vertical alignment.

Visibility splays at the emergency / pedestrian / cycle access, and the additional cycle access to the north, are also required, based on the derestricted approach speeds. Where the splays cannot be achieved, robust justification must be provided to demonstrate that any departure from standard is acceptable, or cycle access at these locations may need to be restricted, which would be contrary to the site's proposed active travel connectivity.

An uncontrolled crossing is shown to the east of the Helen Allison School. However, the visibility splays are incorrectly shown. The 'X' distance should be 1.5 m, and the 'Y' distance should extend to the nearside kerb, rather than into the carriageway. It is also noted that the crossing is located in close proximity to existing utilities, which may raise issues at detailed design.

Additional Parking

Paragraphs 6.77–6.80 of the UTA refer to the provision of additional on-site parking intended to alleviate existing on-street parking stress. However, the number of spaces to be provided is not specified. As this relates to an internal site layout detail and is not required to demonstrate the acceptability of the development in highway terms, this can be reviewed at the detailed design stage.

Trip Generation and Junction Capacity Modelling

The development is anticipated to generate 62 two-way trips in both the AM and PM peak hours. This is considered reasonable for a development of this size.

As requested, the applicant has assessed the impact of the development on the highway network using the Kent Transport Model (KTM), for the following six scenarios:

1. 2032 Reference Case (assumed opening year)

2. 2032 Reference Case + Development
3. 2032 Reference Case + Development + Site GB/20250992 (sensitivity assessment)
4. 2042 Local Plan
5. 2042 Local Plan + Development
6. 2042 Local Plan + Development + Site GB/20250992 (sensitivity assessment)

Based on the KTM outputs, 13 junctions are predicted to experience flows of over 30 two-way trips in scenarios three and six during the AM and/or PM peak periods. These are as follows:

1. Longfield Road / Site Access
2. Wrotham Road / Longfield Road
3. Wrotham Road / Green Lane
4. Wrotham Road / Huntingfield Road
5. Wrotham Road / Lewis Road
6. Wrotham Road / Istead Rise
7. Wrotham Road / Station Road
8. Wrotham Road / A2 (double roundabout)
9. Camer Road / Norwood Lane
10. Sole Street / The Street / Jeskyns Road
11. Longfield Road / Huntingfield Road
12. Main Road / Manor Road
13. Main Road / Nurstead Lane

The above junctions have been assessed further using approved local junction modelling software. The modelling results show that junctions 3, 5, 6 and 10 are predicted to operate over capacity in either the AM peak, PM peak, or both, under scenario 4 (2042 Local Plan). The addition of the development in scenario 5 is shown to result in a negligible increase in delay and queueing at these locations.

Whilst further deterioration may occur under scenario 6, this impact will be considered as part of the associated application (GB/20250992). For the purposes of this application, the impact of the proposed development is considered negligible and no mitigation is therefore required.

It is understood that National Highways has requested further information in relation to the A2 junctions on the Strategic Road Network. KCC will await this information before providing further comments in this regard.

Travel Plan

The Travel Plan has been updated. Paragraph 5.8 states “...*It should be noted that there is a low propensity to travel by bus, foot and cycle. Evidently, there is an opportunity to improve the use of public transport and active travel.*” This supports the need for contributions to enhance the existing public transport offer, which the applicant has agreed to in principle at paragraph 5.11.

Travel Plan monitoring should include details of the uptake of the free public transport tickets, to allow the effectiveness of this measure to be assessed.

The Road Safety Auditor has recommended parking restrictions along Longfield Road to ensure that visibility splays remain unobstructed. In the Designer's Response (Appendix H), the applicant notes that such restrictions may displace existing parking, but confirms that this can be discussed with KCC. The Travel Plan monitoring methodology should therefore include a requirement to monitor on-street parking along Longfield Road between the site and Huntingfield Road. In consultation with KCC, consideration should be given to the introduction of parking restrictions, with the application for and implementation of such measures to be

funded by the applicant, should parking issues arise that affect the operation of the visibility splays following occupation of the development.

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.