

20250992 Land at Wrotham Road Meopham

National Highways received additional information from the applicant's agent (HUB Transport Planning) on 8 April 2026. This information specifically related to the proposed development trip distribution and assignment based on strategic model data. A review of the information submitted concluded that additional information was required as detailed in our official response on 26/05/2026.

We have reviewed the documents submitted in relation to the current re-consultation with reference to previous comments, where applicable.

We have concluded that further evidence required is address actions points as detailed below.

Our recommendation that **planning permission not be granted for a period of three months until 26 August** sent on 26/05/2026 till holds. This is to allow time for the applicant to address the action points identified in our response.

This recommendation can be replaced, renewed, or reviewed during the three-month period, or at its end, dependent on progress made with regards to the outstanding matters.

Throughout this response **ACTION points** for the applicant are highlighted in **underlined bold**.

Transport Vision

No reference has been made to DfT Circular 01/2022 and the transport vision or supporting measures for the site. **The submission should include a vision together with supporting measures to reduce travel by private car, as per guidance set out in DfT Circular 01/2022.**

Personal Injury Accident Data

Table 7 of the TA presents Personal Injury Accident (PIA) data for the A2/Wrotham Road junction. The TA includes a brief summary of accident causation factors. We note that the PIA data included as Appendix C of the TA does not cover this junction.

To enable us to verify the conclusions drawn from the PIA data, we require a full copy of PIA Data including Location Plan showing reference numbers to be provided for review. Confirmation should also be provided regarding the extent of the A2 mainline, eastbound and westbound, which has been included as part of this analysis.

Sustainable Travel

The TA includes an access appraisal which seeks to demonstrate that there are a range of local facilities that could be accessed via active travel modes, within recommended walking and cycling distances.

With regard to bus services, we would note that the existing services are infrequent, on weekdays they range from two to seven services per day on each route.

However, there are relatively frequent rail services (hourly or half hourly) from Meopham to destinations such as London Victoria, Gillingham and Dover Priory.

Paragraph 5.69 of the TA states: *'A walking and cycling audit has been undertaken that has identified several off-site measures that can potentially be implemented to improve the uptake of active travel to local facilities and public transport interchanges. These are detailed further later in this report.'*

We would expect that these measures be linked to the transport vision of the site and for corresponding mode shift targets to be applied to the baseline mode share. More detailed comments will follow in the Travel Plan review section below.

The TA outlines a series of mitigation measures to improve accessibility of the site. **Any modal shifts assumed as a result of any proposed mitigation measures would need to be achievable and linked to the transport vision for the site.**

Trip Generation, Distribution and Assignment

The TA states that the junction capacity tests have been rerun based on the turning count data derived from the GTM and that the re-run models therefore supersede the initial results presented as part of the interim TA. **Full details of the model re-runs are required to be provided to National Highways for review.**

Model Runs

Table 16 of the TA lists the 8 scenarios which have been tested in the GTM model, with AM (08:00-09:00) & PM (17:00-18:00) turning count outputs produced. It is also noted that the references to Site 1 and Site 2 refer to the proposed development (350 dwellings) and a proposed development off Longfield Road (120 dwellings – LPA Ref: GB/20250993), respectively.

Paragraph 7.5 of the TA states that Jacobs requested committed development lists from GBC but did not receive a response. It was then agreed with KCC that TEMPro factors would be used for the 2032 Reference Case scenario to avoid any further delays.

NH would highlight that all relevant committed development may not be included within the TEMPro planning assumptions. Furthermore, the sole use of an overall growth factor instead of adding specific flows to individual turning movements may dilute the impact of committed development traffic.

Given the sensitivity of the A2/Wrotham Road junction and the risk of traffic queuing back onto the A2 mainline, we would re-iterate our recommendation that the applicant obtain an up-to-date list of committed development and schemes from the LPA, written confirmation of these should then be provided to National Highways for review.

Paragraph 7.6 of the TA states that 'The 2042 Local Plan scenario includes all known allocated sites within the Gravesham area at the time the modelling was commissioned/started. **Clarification should be provided regarding whether this**

scenario reflected known allocations as per the adopted Local Plan, the Regulation 19 Local Plan document or the earlier Regulation 18 version.

Paragraph 7.7 of the TA states 'To create a robust assessment, a base model enhancement was undertaken to identify any discrepancies between the observed data and model flows by Jacobs.' **We would request that full details of the 'base model enhancement' undertaken be provided to National Highways for review.**

Trip Generation

The vehicle trip rates and trip generation set out in Table 17 of the TA were accepted as a 'pre vision' scenario. The 350 dwellings are forecast to generate a total of 179 and 182 two-way vehicle trips in the AM and PM peak hours respectively.

Distribution and Assignment

GTM Assessment

The TA notes that there are still outstanding queries from National Highways in relation to the GTM trip distribution and assignment (as detailed in our response in 25/05/2026) and confirms that the details have been requested from Jacobs and will be provided to National Highways in due course.

Consequently, the GTM distribution and assignment cannot be agreed until this information has been received and reviewed.

A2/Wrotham Road Manual Assessment

In the meantime, the TA includes a manual trip distribution and assignment exercise, based on Census 2011 Method of Travel to Work data.

The Census 2011 based distribution exercise assigns 75% of development traffic to the A2/Wrotham Road junction. This equates to circa 134 and 137 two-way vehicle trips in the morning and evening peak hours respectively.

We understand that the manual assessment has been undertaken to progress matters in advance of the outstanding GTM matters being resolved. **However, confirmation should be provided as to whether the manual assessment will be superseded by the GTM assessment once the GTM flows are agreed.**

Traffic Impact and Capacity Assessments

The TA includes a list of 14 junctions which have been identified as requiring junction capacity analysis, this consisted of junctions which were predicted to have a peak hour impact of more than 30 vehicles (two-way).

NH note that the level of traffic impact at each junction has been taken from the initial KTM model runs. Given the need for further information relating to these model runs, we are unable to comment on the full extent of this list and whether any additional SRN junctions may also need to be included.

Notwithstanding the above, we note that the only SRN junction on the list is the A2/Wrotham Road junction which has been included as 'Junction 9 - Wrotham Road/A2 (Double Roundabout)' Sensitivity Assessment

The TA notes that the proposed development (Site 1) and land south of Longfield Road (Site 2) may progress through the relevant planning stages at similar timescales and, subject to approval, may be occupied within similar timeframes.

The TA also clarifies that neither development is reliant on the other coming forward and therefore this development proposal should be considered on its own merits, albeit the sensitivity assessment gives an indication of potential cumulative impact should the Longfield Road proposals come forward.

NH note that an additional manual assessment is also provided for the A2/Wrotham Road junction.

The junction models have been used to test the 6 scenarios with tests including Site 2 are to be considered as sensitivity assessment for the purposes of the TA.

Clarification should be provided regarding the assumptions applied to each scenario in terms of committed/Local Plan development and associated schemes.

A2/Wrotham Road Assessment: Base Model Calibration/Validation

As previously requested, the TA contains assessment at the A2 / A227 Wrotham Road junction, comprising the north and south dumbbell roundabouts.

The geometry provided within the submitted Junctions 11 model for the north and south roundabout has been reviewed. The geometry used for the model is inconsistent with recent planning application.

The demand sets within the Junctions model have been reviewed and we note the following:

- Traffic flow profile is 'one hour' – we confirm this is acceptable
- 2025 Base traffic flows have reviewed – AM and PM peak hour flows (PCU/hr) confirmed to align with the provided traffic flow diagrams
- Future year demand sets are under review and have therefore not been considered

The calibration within the model has been reviewed, it is seen that 'direct intercept' adjustment has been applied on the A2 eastbound off-slip arm.

The TA states that the MCC observed average and 95th percentile queue data has been utilised to validate/calibrate the model for the 2025 base year. This data is summarised within Table 19 of the TA, for the AM and PM peaks.

We note the queue survey data contained within Appendix N of the TA. The queue data which should be used for the purpose of the calibration is the highest 15-minute average which was observed on each arm of the junction. This is required to align

with the Junctions output, which reports the highest 15-minute average queue on each arm.

The video survey should be provided to demonstrate the reported queue lengths.

Nonwithstanding the above comments on the base model NH has accepted the base model for this junction for Planning Application ref: 202512 (An outline planning application for the demolition of 64 Downs Road and erection of up to 154 residential dwellings (including affordable housing), with all matters reserved except for access at Land at Rose Farm) and suggest this base model is used for expediency in resolving this issue.

TEMPRO (Manual Assessment)

The TA states that adjusted TEMPRO factors have been obtained for the AM and PM peak periods.

However limited information has been provided in relation to how the proposed factors have been calculated.

We therefore request full details to be provided, including all selection criteria utilised and full details of all planning assumption adjustments applied for all assessment years.

Committed Development

We previously identified two consented developments which were committed to deliver committed schemes at the A2/Wrotham Road junction.

We also recommended that once the full extent of SRN assessment has been agreed, the applicant should seek an up-to-date list of committed developments and details of committed schemes from the LPA. We would therefore re-iterate this request.

Scenarios Assessed

The TA states that the scenarios assessed in the junction models are consistent with the GTM scenarios. We would re-iterate our request for further information with regard to these scenarios as detailed above.

Junction Assessment

Junction 7 - Wrotham Road/A2 (Double Roundabout) – GTM Assessment

Given the issues with the base models, we will not be commenting on any of the future year assessments at this stage. Furthermore, and noted previously, we are still waiting for further information regarding the GTM flows.

Junction 7 - A2/Wrotham Road (Double Roundabout) – Manual Assessment

As above, given the issues with the base models, we will not be commenting on any of the future year assessments at this stage.

Junction Mitigation

‘Interim’ Mitigation Scheme

The TA refers to the interim mitigation which has previously been advised. However, there is no Junctions assessment presented for the interim mitigation scheme.

We suggest that lane simulation is adopted within the Junctions model, for the purpose of allowing assessment of the proposed interim mitigation. The base model should therefore include lane simulation.

For the avoidance of doubt, a model of the interim mitigation scheme should then be derived from the base model with lane simulation.

‘Final’ Mitigation Scheme

We have undertaken preliminary review of the submitted LinSig and note:

- Geometry –
 - A2 westbound off-slip – lane 2/1 noted to be provided with a length of 5 PCU
 - **Wrotham Road north - lanes should be 40m in length**
- Give-ways –
 - Wrotham Road south – we acknowledge the maximum flow taken from Junctions, coefficient should also be taken from the calibrated Junctions model
- Signals –
 - We acknowledge the signalised pedestrian crossing is included
- Traffic flows –
 - Noted to be subject to change and have therefore not been reviewed

Proposed Amendments to ‘Final’ Mitigation Scheme

Whilst we note the proposed modifications, the modelling of these has not been reviewed in detail at this stage. However, we acknowledge the modelling of the Wrotham Road south with two lanes which reflects the on-site layout.

Northern Junction Considerations

The TA includes various observations regarding the operation of the northern junction. However, due to the outstanding matters regarding the base models, we are currently unable to comment substantively on the need for mitigation or otherwise, at this junction.

Merge/Diverge Assessment

We acknowledge that merge/diverge assessment has been undertaken at the A2 merge and diverge locations. We note the information provided within the TA and Appendix S. The presented methodology is concluded to be broadly acceptable and will be further reviewed following confirmation of the traffic flows.

A2/Wrotham Road Amended ‘Final’ Mitigation Scheme Design Comments

Whilst we note that the modelling of this scheme is yet to be agreed, we have undertaken a high level review of the proposed amendments to the ‘Final’ mitigation scheme design, as shown indicatively on Ridge drawing number T25512 SK002 and our initial preliminary comments are as follows.

The alignment of the road markings of the northbound approach encourages drivers to follow the nearside kerb, then turn right into the two-lane section and then left to enter the roundabout. Drivers are unlikely to make that manoeuvre and are likely to overrun the central hatching to enter the right lane. **The alignment of the road markings should be reviewed to align with potential usage of the roadspace.**

A small length of nearside solid road marking hatching has been incorporated to ensure that the entry path radius conforms to clause 3.26 of DMRB CD116. Whilst the entry path radius can be measured from an edge marking, this small section of road marking is likely to not be adhered to by drivers. A solid hatched road marking is likely to also reduce skid resistance and may cause issues for pedestrians and cyclists using the dropped crossing. **Alternative measures should be investigated, such as kerbline amendments, to ensure that the entry path radius conforms to clause 3.26 of DMRB CD 116.**

Swept path analysis is required to demonstrate that both lanes of the northbound approach can be used without vehicles encroaching into the adjacent lane.

The proposed mitigation works would be subject to a Stage 1 Road Safety Audit in accordance with DMRB GG119.

TA Summary and Conclusion

Given the number of outstanding issues which require clarification/further information to be provided, we are not yet able to comment on the findings set out in these sections of the TA.

Travel Plan

The Travel Plan refers to the NPPF but does not refer to DfT Circular 01/2022 or set out a clear transport vision for the site. **The submission should include a site-specific vision, with supporting measures to reduce reliance on the private car, and clearly link proposed mode shift targets to that vision.**

The applicant's willingness to make a contribution towards bus service improvements, in line with the request from the KCC public transport team, is noted. This is relevant given the current limitations in the bus offer, particularly the absence of Sunday services.

The existing modal split Census data has been reviewed and is accepted as an appropriate basis for the current mode share.

To ensure that Travel Plan targets are realistic and achievable, it is proposed that they are reviewed following baseline travel surveys undertaken within three months of first occupation. A target survey response rate of 50% has been set to provide a robust dataset for monitoring travel patterns.

We note the proposed 7% target reduction in single-occupancy car use from the baseline survey results, within five-years of first occupation. **However, the corresponding 7% increase in sustainable travel should be broken down by mode rather than grouped together, particularly given the acknowledged lack**

of designated cycle infrastructure near the site and the absence of Sunday bus services.

The hard and soft Travel Plan measures are noted, but at present they are described in broad and largely indicative terms. **Greater clarity is required as to which measures are being relied upon as specific commitments and which are only potential measures.**

Should you or any others have any queries regarding our response, please contact us via planningse@nationalhighways.co.uk