



National Highways Planning Response (NHPR 25-01) Formal Recommendation to an Application for Planning Permission

From: Hermes Luli (Head of Planning & Development)
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To: Gravesham Borough Council (FAO Mrs Alison Webster)
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CC: transportplanning@dft.gov.uk
spatialplanning@nationalhighways.co.uk

Council's Reference: 20250993

Location: Land Adjacent to Longfield Road Meopham Gravesend Kent DA13 0EW

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.

National Highways Ref: NH/25/13748

Referring to the consultation on a planning application dated 3 October 2025 referenced above, in the vicinity of the A2 and M20 that forms part of the Strategic Road Network, notice is hereby given that National Highways formal recommendation is that we:

- ~~a) offer no objection (see reasons at Annex A);~~
- ~~b) recommend that conditions should be attached to any planning permission that may be granted (see Annex A – National Highways recommended Planning Conditions & reasons);~~
- c) recommend that planning permission not be granted for a specified period (see reasons at Annex A);**
- ~~d) recommend that the application be refused (see reasons at Annex A)~~

Highways Act 1980 Section 175B is not relevant to this application.¹

This represents National Highways' formal recommendation and is copied to the Department for Transport as per the terms of our Licence.

Should the Local Planning Authority propose not to determine the application in accordance with this recommendation they are required to consult the Secretary of State for Transport, as set out in the [Town and Country Planning \(Development Affecting Trunk Roads\) Direction 2018](#), via transportplanning@dft.gov.uk and may not determine the application until the consultation process is complete.

The Local Planning Authority must also copy any consultation under the 2018 Direction to PlanningSE@nationalhighways.co.uk.

This response and all comments outlined herein are made in respect of planning matters only in National Highways' position as a statutory planning consultee, and does not confer any proprietary rights nor amount to the giving or refusal of consent, assent, approval, or awareness of or by National Highways in or of any other aspects or matters (including, but not limited to, the use of property belonging to National Highways). If anyone wishes for National Highways to consider any aspects which do not relate to planning submissions, they should call our contact centre on 0300 123 5000.

Signature:



Date: 12 June 2026

Name: Bidur Rajbhandari

Position: Assistant Spatial Planner

National Highways

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Annex A **National Highways' assessment of the proposed development**

National Highways has been appointed by the Secretary of State for Transport as a strategic highway company under the provisions of the Infrastructure Act 2015 and is the highway authority, traffic authority and street authority for the Strategic Road Network (SRN). The SRN is a critical national asset and as such we work to ensure

¹ Where relevant, further information will be provided within Annex A.

that it operates and is managed in the public interest, both in respect of current activities and needs as well as in providing effective stewardship of its long-term operation and integrity.

Recommend that planning permission not be granted for a specified period:

It is recommended that the application should not be determined for a period of three months until **12 September 2026**.

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.

We will be concerned with proposals that have the potential to impact on the safe and efficient operation of the SRN, in this case, particularly within the vicinity of A2 and M20.

Further to our response on 26/02/2026 We have reviewed the Technical Note and appendices uploaded on 26/05/26. We require further information to be provided by the applicant on this application in order that an informed decision can be made in relation to the potential impacts of the development on the strategic road network. In particular, the following comments should be passed onto the applicant:

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

Transport Vision

Please note that the TA should include a vision for the site prepared in accordance with the requirements of DfT Circular 01/2022 and also set out how the vision will be realised, with details of supporting measures.

Please note trip generation set out in TA would only be accepted as a 'pre-vision' scenario when this is carried out.

Personal Injury Accident Data

STATS 19 level accident data will be required for area that will be required for location that will depend on potential impact on SRN

Committed Development/Schemes

There may also be a need to review the committed developments considering the requirements of DfT Circular 01/2022. There will also be a need to agree the

committed developments with the LPA and to then provide this information to National Highways for review depending on the area of impact.

SRN Impact Assessment

As noted before we are concerned specifically A2/Wrotham Road junction is currently operating under congested conditions during the evening peak hour at the southern roundabout with queueing traffic on the A2 westbound off slip.

We have reviewed the traffic model for this junction. The TN states in the 'Validation and Calibration' section that it has been validated using observed queues. Table 7 details the result of calibrated 2025 Base Model queues which are significantly lower than the observed queues. **The base model queues needs to be within acceptable limits to the observed queues for validation**

This junction has been modelled in other applications which has been accepted by NH (20251233, Land At Rose Farm, Downs Road, Istead Rise, Gravesend Kent) and the geometries are significantly different than the ones in the model outputs in the TN.

The applicant need to check /calibrate the base model and provide evidence to corroborate their measurement to ensure that the model has been calibrated robustly.

We would only then be able to assess the impact to SRN

As noted before there are two mitigation schemes. **Looking at other applications in the area similar to this one we suggest that modelling is also carried out for 'interim mitigation schemes associated with Former Tollgate Hotel which may be adequate to cater to the trips generated by this development for relevant conditioning.**

CEMP Requirements

Given the location of the proposed development site, we are likely to recommend that a Construction Environmental Management Plan (CEMP) be secured via planning condition at the appropriate stage of the planning process.

Standing advice to the local planning authority

The Climate Change Committee's [2022 Report to Parliament](#) notes that for the UK to achieve net zero carbon status by 2050, action is needed to support a modal shift away from car travel. The NPPF supports this position, with paragraphs 77 and 110 prescribing that significant development should offer a genuine choice of transport modes, while paragraphs 109 to 116 etc advise that appropriate opportunities to

promote walking, cycling and public transport should be taken up as part of a vision-led approach.

Moreover, the carbon reduction hierarchy (avoid-switch-improve) as set out in clause 4.3 of PAS2080:2023 promotes approaches and measures to minimise resource consumption and thereby reduce carbon emissions.

These considerations should be weighed alongside any relevant Local Plan policies to ensure that planning decisions are in line with the necessary transition to net zero carbon.