



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

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To: Gravesham Borough Council (FAO Mrs Katherine Parkin)
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CC: transportplanning@dft.gov.uk
spatialplanning@nationalhighways.co.uk

Council's Reference: 20260207

Location: Land North Of, Camer Road, Meopham, Gravesend Kent,

Proposal: Outline planning application for up to 725 dwellings (Use Class C3), a new two-form entry primary school (Use Class F1), a Local Centre (up to 500sqm of Class E floorspace), the provision of Public Open Space including sport and recreation facilities alongside associated access, landscaping, parking, and infrastructure; with all matters reserved except for access.

National Highways Ref: NH/26/15382

Referring to the consultation on a planning application dated 23 February 2026 referenced above, in the vicinity of the A2 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: 24 June 2026				
<table border="0" style="width: 100%;"><tr><td style="width: 50%;">Name: Bidur Rajbhandari</td><td style="width: 50%;">Position: Assistant Spatial Planner</td></tr><tr><td colspan="2" style="padding-top: 5px;">National Highways Ground Floor, Building 1000, Cathedral Square, Guildford GU2 7YL www.nationalhighways.co.uk</td></tr></table>		Name: Bidur Rajbhandari	Position: Assistant Spatial Planner	National Highways Ground Floor, Building 1000, Cathedral Square, Guildford GU2 7YL www.nationalhighways.co.uk	
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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:

Further our comments we sent on 23/03/2026 we have not received any response.

It is therefore recommended that the application should not be determined for a period of three months until **24 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 junctions A2/A227 (Wrotham Road) and A2/Henhurst Road/ Hever Court Road.

Reasons

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**.

Background

It is our understanding from the information included in the Transport Assessment (TA), that the proposed development is not a site which is to be potentially allocated in its entirety via the emerging GBC Local Plan (due to be submitted for examination by December 2026 as outlined in the LDS dated March 2025).

No previous consultation with National Highways has taken place but it is noted that engagement with KCC has taken place specifically in required to the modelling requirements and inclusion of the Kent Transport Model (KTM) outputs.

We are aware that an emerging Local Plan is being prepared for GBC and sections of the Proposed Development do fall within the proposed site allocations brought forward for consideration in the previous Regulation 18 consultation, as shown in the figure below. **We would recommend further clarification be sought as to whether this land and/or development is anticipated to be included in the Regulation 19 Local**

Plan. This is important to ensure the local plan trips included in the KTM and scenario 3 of the modelling, reflects the development trips correctly (due to risk of double counting).

Figure 1 : Potential Development Sites (Copied from the Regulation 18 Local Plan – Figure 14)



Notwithstanding the above, as the application for this site has been brought forward in advance of adoption of the emerging Local Plan, it has been assessed as a stand-alone site.

National Highways has engaged previously with GBC and KCC Highways on the technical work to support the emerging Local Plan, including use of the Kent Transport Model (KTM). JSJV and National Highways therefore have a good understanding of the KTM and its application for multiple Local Plans in Kent.

This understanding has been applied in our assessment of the presented technical exercises for this development which make use of KTM data

Transport Vision

While we consider the proposed Vision to be appropriate in principle, **we note that it should be fully aligned throughout the Transport Assessment, in particular the trip generation calculations and associated modelling.**

Chapter 4 of the submitted TA outlines how sustainable measures are envisioned to come forwards as part of the development. This includes a bus route and associated bus stops to be positioned within the site; it is noted that it is expected to form part of an extension of an existing route. Whilst it is necessary for KCC to confirm this route being extended, we note that initial discussions at the outline stage have taken place with bus operators and KCC.

Similarly, the outline planning application refers to walking and cycling improvements between the development Site and access to Sole Street Train Station, which aims to improve the attractiveness of using the train as a main mode of transport.

Whilst these mitigations are welcomed and will assist in achieving the objectives set out in the Transport Vision, the assessment included within the TA still follows a predict and provide methodology and does not appear to account for the benefits which the

proposed active and sustainable modes would have in facilitating the transfer of car-based trips to these alternatives. **We would expect appropriate modal shift targets to reflect the Vision and measures being implemented on Site to be included in the prepared trip generation assessment and associated modelling.**

Additionally, once established, the Vision led modal split should be reflected within an updated TP. The TP should demonstrate how the Vision will be underpinned by measures and initiatives designed to maximise active and sustainable travel.

Trip Rates and Generation

As above, Vision-led targets should be applied to the trip generation initially established via the predict and provide methodology for all proposed land uses. Further analysis is required to demonstrate that the site and proposed measures will be capable of delivering mode shift which is compatible with the wider Vision for the site.

We are specifically seeking reassurance that the proposed trip generation and movement towards sustainable modes is achievable and is identified and reflected through trip generation and trip distribution exercises.

The approach included in the TA, including the use of TRICS, census and internalisation of trips in principle is in alignment with our expectations to establish the baseline behaviour. **We therefore require appropriate modal shift targets to be identified and applied within the subsequent trip distribution and modelling as per the circular 01/2022.** No further comment can be made until the TA provides a vision led approach throughout the report.

Trip Distribution and Assignment

It is acknowledged that flow bundle analysis has been used to establish the trip distribution/assignment for both the residential and employment trips represented in the KTM exercises. We recognise that this information has been established by TTC through the liaison and work with KCC's modelling team.

We are unable to accept the development trip outputs (as per Appendix J) until the required revision to the trip generation is complete and agreed. Once this has been done, we recommend that the development trip distribution/assignment plots are manually amended to show any corresponding reduction in vehicle trips, as this will then produce the "residual" trip generation and distribution information required to comply with Circular 01/22.

Notwithstanding the above comments, Appendix J of the TA presents the flow bundle analysis for the development trips that have been established within the current assessment. It shows that in the AM peak; an additional 172 trips join the A2

westbound at its junction with A227 (Wrotham Road). **We note that this is a known congested area, therefore we suggest seeking further information on the level of queueing that may arise because of the additional 172 trips and if any impact on the slip occurs; initially this can be produced using delay plots from the KTM as needed. Consideration needs to be given to the level of congestion occurring but also any safety implications on the SRN junction that may arise as a direct result of the additional development trips.**

Further clarification is required on the difference between the flow bundle analysis plots and the flow differences plots (between the RC and Scenario 2) included in Appendix J. It is our understanding that the flow bundle development trips figure shows the development trips and their routed destinations. The flow difference plots show the difference in trips between the reference case and scenario 2, which should therefore be the development trips.

However, in the PM peak on the A227 Wrotham Road only a small increase in trips is shown (e.g. 10) however for the same peak in the flow difference plots, an increase of 104 trips is shown.

This would suggest that the impact of the development flows is causing a change in driver's route choice within the KTM and further explanation of this is therefore required.

Kent Transport Model Output Assessment

As outlined above, the current trip generation and associated modal split require a revision to be in accordance with the DfT Circular 01/2022. Therefore, whilst notes have been provided below on the modelling in the current TA, we seek further review of the modelling as a result of the agreement of the trip generation rates.

The approach to the modelling and the use of the Kent Transport Model (KTM), is welcomed in principle, including the work with KCC.

We consider that the geographical scope of the assessments is unlikely to change as a result of the amendments to the trip generation work, as this is expected to result in a reduction in the total number of vehicle trips. However, following the review of the modelling outputs results provided at this time, clearer model plots are requested on the following junctions:

- **A2/A227 (Wrotham Road)**
- **A2/ Henhurst Road/ Hever Court Road**

Further evidence is required to review the impact the additional trips have on the A2 junctions as these are of importance to National Highways. In the PM peak scenario 2, it is identified that a range of Level of Service (LoS) is seen including C,F,F with one of the nodes increasing from an E to an F when comparing the reference case to

scenario 2, whereby the difference between the two is the inclusion of development trips. **Clarification is required on which arms are increasing/where the LoS of F is occurring.**

Similarly, in all scenarios presented, a LoS of F is identified on the A2/A227 (Wrotham Road) junction. The V/C ratio at this junction is also identified as being over 100% in both scenario 1 and 2.

The westbound off slip has a delay of 1 minute; however, it needs to be understood what the impact on queuing is at this point and if there are any safety concerns regarding whether that queue may begin to impede the main carriageway.

It is anticipated based on the current strategic modelling outputs that have been provided, that local modelling of the identified SRN junctions may be required; the requested further information should be provided so that National Highways can ultimately determine if this is necessary. If this is the case, the scope of the required work should be established and scoped with National Highways prior to commencement.

Whilst it is noted that this application has come forward earlier than the adoption of the Local Plan and therefore the inclusion of scenario 3 is useful and welcomed background information, we have not assessed the proposal based on the outcomes of scenario 3.

Travel Plan

A Framework Travel Plan is provided as part of the planning application (20260207). However, as identified earlier within this response, supporting information relating to the development modal split vision is missing. Upon receipt and review of this information, we bein a position to provide substantive comment on the submitted TP.

CTMP

Given the location of the proposed development site a full CTMP will need to be secured via planning condition at the appropriate stage of the planning process covering the preparation, agreement, and adherence.

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.