



National Highways Planning Response (NHPR 26-09) Formal Recommendation to an Application for Planning Permission

From: [REDACTED] (Head of Planning & Development)
Operations Directorate
South East Region
National Highways
PlanningSE@nationalhighways.co.uk

To: Gravesham Borough Council (FAO Mrs Katherine Parkin)
planning.reps@gravesham.gov.uk

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 September 2026
Name:		Position: Assistant Spatial Planner
National Highways Ground Floor, Building 1000, Cathedral Square, Guildford GU2 7YL www.nationalhighways.co.uk		

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 that it operates and is managed in the public interest, both in respect of current

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

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 23/06/2026 we have reviewed the National Highways Consultation response prepared by ttc date June 2026.

It is therefore recommended that the application should not be determined for a period of three months until **24 December 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**.

Kent Transport Model Output Assessment

Traffic Flow Changes

The TTC TN contains a series of tables (Tables 1.1 to 1.4) showing the turning movements at the two SRN junctions (A2/Henhurst Junction and A2/Wrotham Road junction), with the difference between the Reference Case and Scenario 2 being presented as the development impact.

However, no select link analysis has been provided. With regard to the reduction in flows, only a very general explanation has been provided.

We therefore still require either the select link analysis of the relevant network or the VISUM .VER files for the scenarios mentioned so that we can review the trip distribution and assignment in more detail.

Delay Plots

We previously requested delay plots be provided for the A2 eastbound off-slip at A227 Wrotham Road. No delay plots have been provided, instead the TTC TN states:

'The delay identified on the westbound off-slip reflects the operation of the wider strategic highway network during peak periods and is present within both the reference case and development scenarios.

Comparison of the two scenarios demonstrates that the proposed development does not result in any material worsening of junction operation or queue lengths beyond those already forecast within the reference case.'

The response does not address our query regarding the A2 Eastbound off-slip. We would therefore re-iterate our request for delay plots for the A2 Eastbound off-slip to be provided.

Committed Highway Schemes

We note that none of the two identified committed schemes for the A2/Wrotham Road junction were included as part of the KTM modelling:

'Jacobs' reply: I can confirm that neither of these schemes has been included within the KTM forecast models. At the time the models were developed, these schemes were not considered committed and therefore were not incorporated into the forecasting assumptions.'

However, the response does not fully address our query regarding whether there are any other committed schemes included in the 2042 KTM models and confirmation of this should be provided.

Notwithstanding the above, should DfT Circular 01/2022 compliant local junction assessments of the A2/Wrotham Road junction be required, the committed schemes identified for this junction would need to be considered as part of the relevant future year scenarios.

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 UK Government has committed to achieving net zero greenhouse gas emissions by 2050 through amendments to the Climate Change Act 2008. The National Planning Policy Framework (NPPF) supports this objective, with Chapter 5 recognising the need to support the transition to a low carbon future and contribute to achieving net zero by 2050. Policies CC2 and TR3 promote sustainable patterns

of movement, reduce reliance on the private car and seek to ensure that significant development is located where it offers a genuine choice of transport modes.

Policies TR3 and TR4 also advise that opportunities to improve walking, wheeling, cycling and public transport should be taken up as part of a vision-led approach to creating sustainable, inclusive and well-connected places.

These considerations should be weighed alongside any relevant Development Plan policies to ensure that planning decisions support sustainable travel patterns and align with the transition to net zero by 2050.