



National Highways Planning Response (NHPR 22-12) Formal Recommendation to an Application for Planning Permission

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To: Gravesham Borough Council (FAO Mrs Amanda Grout)
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CC: transportplanning@dft.gov.uk
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Council's Reference: 20230757

Location: Manor Hotel, Hever Court Road, Gravesend, Kent DA12 5UQ

Proposal: Redevelopment of the site for a residential development comprising 12 new houses with associated access, private amenity space, vehicle parking provision, refuse and cycle storage.

National Highways Ref: NH/23/02985

Referring to the consultation on a planning application dated 3 October 2023 referenced above, in the vicinity of the A2 near Singlewell, Gravesend 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);~~

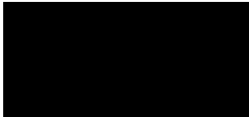
~~d) recommend that the application be refused (see reasons at Annex A)~~

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 not propose 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.

Signature: 	Date: 23 October 2023
Name: Kevin Bown	Position: Spatial Planner
National Highways Bridge House, 1 Walnut Tree Close, Guildford GU1 4LZ	

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 activities and needs as well as in providing effective stewardship of its long-term operation and integrity.

The SRN in the vicinity of this site comprises the A2/ M2. All other roads locally are managed by KCC Highways.

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

Recommendation: that conditions should be attached to any planning permission that may be granted

Reasons

We will be concerned with proposals that have the potential to impact on the safe, reliable and efficient operation of the SRN, in this case, including the proposed route of the Lower Thames Crossing in the vicinity of Gravesend.

We have assessed the application from two perspectives:

- 1) Impact of traffic attracted to or generated by the proposed development once the site is developed.

We note that the Transport Statement has not been produced in compliance with DfT C1/22; for example, no Vision is included and very little included by way of assessment, explanation or proposals regarding active and sustainable transport.

However, we are content that the imposition of a robust Travel Plan condition can provide the means by which this key plank of national policy can be complied with and hence minimise the impact of the development on the SRN.

Subject to this condition (see below), we have no objection from this perspective.

- 2) Impact on the construction and/or operation and maintenance of Lower Thames Crossing. The site is located close to the current red-line boundary for the Lower Thames Crossing. We have concerns regarding the potential for impacts on the SRN during the construction phase of the proposed development, particularly if it coincides with Lower Thames Crossing related works. Therefore, we recommend that a Construction Traffic Management Plan condition (see below) be attached to any permission granted.

It should be noted that it is assumed that the applicant is fully aware of the proximity of the Lower Thames Crossing route to the site as will be any future investor, developer, purchaser or occupant and that any party will make any decision in full knowledge of the potential consequences of that proximity.

On this basis, we are content that, subject to the imposition of the recommended conditions (see below), the above proposed development will not unacceptably impact on the safety, reliability and/or operational efficiency of the current and proposed SRN (the tests set out in DfT C1/22 and DLUHC NPPF2023).

Consequently, we have No Objection to application 20230757 subject to the imposition of the recommended conditions set out below.

Condition – Travel Plan:

Prior to the first occupation of the development hereby permitted a detailed Travel Plan, to ensure the reduction of private car-based trips and promote active and sustainable travel, shall be submitted to and approved in writing by the local planning authority and thereafter fully implemented. The Travel Plan shall include details regarding responsibilities and arrangements for monitoring, review, amendment and effective enforcement.

Reason: To ensure that the A2 Trunk Road continues to be an effective part of the national system of routes for through traffic in accordance with section 10 of the Highways Act 1980 and to satisfy the reasonable requirements of road safety and paragraph 111 of the National Planning Policy Framework (2023).

Pre-Commencement Condition: Construction Traffic Management Plan

No works shall commence on the site hereby permitted (including site clearance or preparation) until the details of a Construction Traffic Management Plan have been submitted to and approved in writing by the local planning authority (who shall consult with National Highways). Thereafter the construction of the development shall proceed in strict accordance with the approved Construction Traffic Management Plan unless otherwise agreed in writing by the local planning authority (who shall consult National Highways).

Reason: To ensure that the A2 Trunk Road continues to be an effective part of the national system of routes for through traffic in accordance with section 10 of the Highways Act 1980 and to satisfy the reasonable requirements of road safety and paragraph 111 of the National Planning Policy Framework (2023) .

Informative: The CTMP shall include details (text, maps and drawings as appropriate) of the scale, timing and mitigation of all construction related aspects of the development. It will include, but is not limited to: site hours of operation; numbers, frequency, routing and type of vehicles visiting the site; travel plan and guided access/egress and parking arrangements for site workers, visitors and deliveries; plus sheeting of loose loads and wheel washing and other facilities to prevent dust, dirt, detritus etc from entering the public highway (and means to remove if it occurs).

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 73 and 105 prescribing that significant development should offer a genuine choice of transport modes, while paragraphs 104 and 110 advise that appropriate opportunities to promote walking, cycling and public transport should be taken up.

Moreover, the build clever and build efficiently criteria as set out in clause 6.1.4 of [PAS2080](#) promote the use of low carbon materials and products, innovative design solutions and construction methods to minimise resource consumption.

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.