



Mr O Neary BA (Hons)
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Ash Road
Hartley
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DA3 8BG

Dear Oliver,

Proposed Vehicle X-Over Fronting onto an Unclassified Road. 21 Hillingdon Road, Gravesend, DA11 7LQ.

Further to your application to Gravesham for the above proposal we wish to add our support. You have highlighted only some of the following benefits:-

- Will enable elderly relatives and friends to visit with better access.
- Will enable EV chargers to be provided as the Government progresses to ban the use of petrol and diesel vehicles.
- Will reduce the upkeep of the lawned area as the householder grows older.
- Provides pedestrian sight lines that accords with the Kent Design Guide.
- Provides pedestrian sight lines that accords with the Design Manual for Roads and Bridges (DMRB).
- There are no reported accidents along the street.
- The access will permit wheelchair access plus for the following:-



We have checked KCC’s gazetteer and the road is unclassified. An extract is shown below.

STREET NAME HILLINGDON ROAD	
USRN	15700379
TOWN GRAVESEND	DISTRICT GRAVESHAM STATUS PUBLICLY MAINTAINABLE HIGHWAY

The following numbers have crossovers.

No 63 to 41 inclusive. No 35 and No 5 has a garage. No 16, 20 and 22 have had crossovers recently.

A photograph is shown below of the local streets with crossovers. The first shows Hillingdon Road and the second The Fairway.



The Fairway – Below.



Pedestrian Sight Lines

They accord with the Kent Design Guide. The parameter range is from 2m to 1m. It does not require a minimum of 2m. Adjoining neighbours along the street have similar pedestrian sight lines.

Kent Design 'creating the design'		Source Kent Design Guide Pg 133 Designing for movement.	
	Typical parameter	Notes	Recommended parameter range (required min or max standard shown in bold)
Width	3.0m	minimum width 3.0m if access required for fire tender	2.4 m / 4.8m
Anticipated vehicle types	car, fire tender	see section 6.16 for guidance on access for fire appliances	
pedestrian visibility at junction with highway	2.0m x 2.0m		>1.0m x 1.0m
Maximum gradient	10%	measures may be needed for driveways having a steep downward gradient to prevent vehicles grounding. This can include providing a roll over as shown below or modifying footway cross fall gradients	0.13

Visability splays at shared and individual
private drive ways



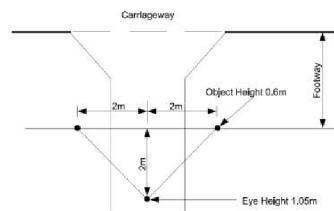
The Design Manual for Road and Bridges is as follows.

CD 123

Geometric design of at-grade priority and signal-controlled junctions

(formerly TD 41/95, TD 42/95, TD 40/94, and those parts of TD 50/04 and TD 70/08 relating to priority and signal-controlled junctions.)

Figure 3.3 Visibility at the back of footway crossing



Consistency

In the High Court Decision below it reiterates LPA's and Highway Authorities should be consistent in their decision-making processes.

106. In *R (Irving) v Mid Sussex DC* [2019] EWHC 3406 (Admin), Lang J confirmed (§75) that it *"is now well-established that a local planning authority ought to have regard to its previous similar decisions as material considerations, in the interests of consistency. It may depart from them, if there are rational reasons for doing so, and those reasons should be briefly explained."*

Pavement Parking House of Commons

The proposal to provide off road parking like their neighbours will ensure the future of on footway parking and possible fines will not occur. In Scotland they have implemented legislation to prohibit parking on footways or suffer fines of up to £100.

Should the application be rejected and a driver be fined for parking on the footway he may use the refusal as a defence in the courts. Again we are unsure if England will use similar legislation in due course.

Road Accidents

There are no accidents along then street over the past 5 years.



Summary and Conclusions

We support the proposal so that KCC can permit the construction of a light duty crossover.

The population is getting older and more off road parking is required in Gravesend including for disabled scooters. With over 34% of the population unable to charge an EV due to their location in flats and many metres from the highway the proposal accords with carbon neutral initiatives.

The proposal will reduce on street parking, which is at a premium in the area. It will also provide a more visible crossover so that drivers will not park in front of the driveway or on the footway. It will improve highway safety for pedestrians including pushchairs and wheelchair access to local schools and the aprk.

The proposal will replicate recently constructed x- overs nearby, including the neighbour's listed in our previous paragraphs. It will provide better access for disabled elderly relatives and friends.

The future opportunity to have on site EV charging will also accord with Government policy. Planning permission is no longer required for EV chargers fronting the highway to be installed.

The proposal accords with the old Local Plan policies plus the 2024 NPPF.

116. Development should only be prevented or refused on highways grounds if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the road network, following mitigation, would be severe, taking into account all reasonable future scenarios.

Upon the issue of the decision letter GSP will then apply to KCC under Section 184 of the Highways Act 1980.

Yours faithfully

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