

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 Lucy Hankin)
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CC: transportplanning@dft.gov.uk
spatialplanning@nationalhighways.co.uk

Council's Reference: 20251308

Location: 354 Thong Lane, Gravesend, Kent, DA12 4LH

Proposal: Demolition of existing outbuilding, erection of double storey front/ side extension with windows to front. Erection of a double storey front porch extension.

National Highways Ref: NH/26/14400

National Highways Case Officer: Kevin Bown

Referring to the consultation on a planning application dated 6 January 2026 referenced above, in the vicinity of the consented alignment of the Lower Thames Crossing that will form part of the Strategic Road Network, notice is hereby given that National Highways' formal recommendation is as follows:

- 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~~ is not relevant to this application.¹

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

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: 19 January 2026

Name: Kevin Bown

Position: 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 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.

Recommendation: No Objection

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, particularly the consented route of the Lower Thames Crossing in the vicinity of Gravesend.

We have assessed the application from two perspectives:

a) Impact of traffic attracted to or generated by the proposed development. Given the location and small-scale nature of the potential development we have no objection from this perspective

b) 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. However, if the site is developed it should not affect the Crossing's construction and/or operation and maintenance. Therefore, we have no objection from this perspective

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 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 Circular 1/2022 and MHCLG NPPF2024).

Consequently, we have No Objection to application 20251308.

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 and 115 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.