



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 Ms R Harrison)
planning.reps@gravesham.gov.uk

CC: transportplanning@dft.gov.uk
spatialplanning@nationalhighways.co.uk

Council's Reference: 20260340

Location: Rockley House , Wrotham Road, Culverstone, Gravesend Kent

Proposal: Demolition of existing stables buildings, removal of sand schools/menages and the erection of 6 dwellings associated vehicle parking, cycle storage and landscaping, with development to be served by existing access.

National Highways Ref: NH/26/15782

Referring to the consultation on a planning application dated 31 March 2026 referenced above, in the vicinity of the A2 and M20 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 April 2026

Name: Bidur Rajbhandari

Position: Assistant 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.

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

Recommendation: No Objection

Reasons

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 M2.

National Highways role is to consider the impacts on the SRN and any need for mitigation. All local road matters (including active & sustainable transport matters) will be dealt with by relevant local highway authority.

We have reviewed the submitted N02 - Highways Technical Note dated 16 December 2025 prepared by Motion and are satisfied that the likely trip generation and distribution is such that the impact on SRN will be minimal and would not have an unacceptable impact on the safety, reliability, and/or operational efficiency of the SRN.

As the focus of the transport documents are on local road network and related matters it will be for the relevant local authority to comment/agree with the Transport Assessment in due course.

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.