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Highways and Transportation
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Tel: 03000 418181
Date: 30 September 2026
Our Ref: AC

Application -	GB/20260815
Location -	Woodlands Farm , Wrotham Road, Culverstone, Gravesend Kent
Proposal -	Outline planning application for the development of 67 dwellings, public open space and associated works, with approval sought for the principal means of vehicular access from Newlands Lane. All other matters are reserved.

Thank you for your re-consultation in relation to the above planning application. Kent County Council Highways (KCC) has the following comments to make with respect to highway matters:

The Site

The site is located to the east of the A227 and south of Newlands Lane in Culverstone Green and is currently formed of a single residential dwelling, outbuildings and associated farmland. Access is currently taken from Newlands Lane – a driveway to the residential property at the A227 / Newlands Lane junction, and an access to the wider site approximately 40 metres further to the east.

Development Proposal

The proposal is for up to 67 residential dwellings, with all matters reserved except for access. The dwellings will be made up of 26x two-bed units, 36x three-bed units and 5x 4-bed units.

Access

Walking and Cycling

Routes used by pedestrians and cyclists should be direct, well connected, well lit, attractive and overlooked. Whilst this may be achievable within the site itself, KCC does not consider that the routes connecting the development to local services and facilities provide infrastructure of a sufficient standard to support the proposed development.

As requested at the pre-application stage, the applicant has undertaken a Walking and Cycling Audit, the findings of which are presented within the report 'Walking & Cycling Audit in Support of a Residential Development' (July 2026).

The Audit identifies a number of existing deficiencies along the routes assessed, including obstructed footways, variable (and what could be considered unsuitable) surfacing material, narrow footway widths (many 1 metre in width), overhanging vegetation, a lack of tactile paving, limited formal crossing opportunities, poor accessibility for disabled users, predominantly unlit routes, and significant traffic flows along the A227. In addition, KCC notes the comments made in Item 15 of the Audit regarding the mature oak tree adjacent to the footway on the A227. Should it be correct that the tree has been struck on multiple occasions

by passing vehicles, this raises concerns regarding the safety and suitability of the route for pedestrians.

With regard to the lack of lighting, the Audit suggests this is consistent with the character of the surrounding area. However, this characteristic nevertheless limits the attractiveness of walking and cycling, particularly during the winter months and outside daylight hours, when the environment becomes less attractive to potential users and personal safety concerns may be heightened. This is likely to discourage active travel and reduce opportunities, particularly for many including women and girls, older people, disabled people, and for independent travel by school-age children.

In relation to Item 29 of the Audit, it should be noted that improvements to the White Post Lane junction are proposed as part of planning application 20250802 (Land at Blackthorn Farm), which was the subject of a recent appeal hearing and the outcome for which is awaited. However, these works would only be delivered should that application ultimately receive planning permission. Should this application not be permitted, this issue would remain.

The Audit does not assess the route to Vigo Primary School, despite this destination being identified within the local facilities assessment. However, it is understood that access to the school would be via narrow country lanes that are unlit, have no footway and are unlikely to provide an attractive or realistic walking route for a broad range of users.

With regard to cycling, there is no dedicated cycling infrastructure along the A227 within Culverstone Green or Meopham and cyclists are required to travel on the carriageway alongside relatively high traffic flows, including HGVs. The route is unlit for significant sections, reducing its attractiveness for year-round use and particularly for journeys during the darker winter months. Figure 4.1 of Local Transport Note 1/20 indicates that cycling in mixed traffic on 30mph roads carrying more than 2,000 vehicles per day, and on 40mph roads of any traffic volume, (both applicable to the local area), will generally exclude most potential users and/or give rise to safety concerns. The applicant's own Transport Statement (TS) identifies average 85th percentile speeds of approximately 44mph northbound and 43mph southbound, which is higher than those associated with a compliant 40mph environment. Furthermore, the comment at Item 10 of the Audit stating that a 'young' cyclist was observed using the footway may suggest a perception that the A227 does not provide a comfortable or attractive cycling environment.

KCC does not consider that the local highway network would provide an attractive or realistic cycling environment for a broad cross-section of the community and therefore cannot be relied upon to provide a genuine choice of transport mode for many day-to-day journeys. Cycling is therefore unlikely to represent a realistic alternative to the private car for many residents.

Whilst the Audit identifies the available routes and their respective deficiencies, it does not adequately consider the implications of these constraints for day-to-day pedestrian and cycle movements, instead largely concluding that such conditions are typical of a rural area. The assessment should extend beyond the mere presence of physical connections and consider their quality, attractiveness and suitability for everyday journeys. The available routes are unlit, narrow, lack natural surveillance and run adjacent to, (or in the case of cyclists directly on), a heavily trafficked high-speed road. These characteristics significantly diminish their attractiveness and perceived safety, particularly for more vulnerable users such as children, older people, people with mobility impairments and parents with prams.

The Audit proposes a small number of mitigation measures to enhance the routes, including a 2.5m wide footpath linking the site to Culverstone Green Community Centre (to bypass the obstructive tree on the A227), and improved crossing opportunities in the vicinity of Newlands

Lane and White Post Lane. However, the proposed crossings (and their visibility splays) are not shown on the plans and this is required in order for their suitability to be assessed.

The proposed footpath is shown on drawing 'Junction & Visibility', ref 634802, however, the entirety of the route is not shown, with the northern end excluded. The entire route and its connection to existing routes must be shown for assessment and conditioning purposes. There are also concerns regarding the deliverability of the footpath, as it is unclear who owns the land through which the route would pass and no evidence has been provided to demonstrate that the necessary land rights are available. Should the route be deliverable, KCC would still have concerns about its appropriateness as the route would not address the majority of the identified deficiencies, but instead provide an alternative route exhibiting many of the same shortcomings, including a lack of lighting, limited passive surveillance and concerns regarding personal security.

The Audit does not demonstrate that the identified deficiencies have been adequately addressed and instead reinforces many of the concerns previously raised by KCC at the pre-application stage. Consequently, KCC does not agree with the Audit's conclusion that the site represents a sustainable location for development. Whilst the proposed mitigation may deliver some localised improvements to pedestrian infrastructure, these measures fall short of the standard required to support a development of 67 dwellings and would not create an attractive, convenient or realistic walking and cycling environment for future residents. More substantial enhancements would be necessary to provide suitable connections to local facilities and it is unlikely that these could be delivered by this developer alone. In addition, KCC's concerns extend beyond the quality of the surrounding active travel infrastructure. Even if such improvements were delivered, the site's fundamental locational disadvantages would remain.

Public Transport

Bus stops are located within walking distance of the site, which is acceptable. However, only the northbound stop benefits from a shelter, whilst the southbound stop comprises a flagpole only. More fundamentally, the presence of bus infrastructure does not, in itself, demonstrate that a realistic alternative to private car travel is available. KCC therefore does not agree with the TS's assertion that the services operating from these stops provide "*convenient connections to surrounding settlements.*"

The site is served by a very limited public transport network, with the 306/308 representing the sole general public bus service available to residents. Whilst this service provides a connection to destinations including Gravesend, Bluewater, Meopham and Borough Green, the frequency and span of the service are limited. The service does not provide the level of frequency or service coverage typically associated with a realistic alternative to private car use for day-to-day journeys. In particular, the service offers only a small number of departures throughout the day, meaning that many journeys are dictated by the timetable rather than the needs of passengers. Missing a service can result in a significant delay before the next available bus, whilst opportunities to travel during the commuter peaks, Saturdays and Sundays are particularly constrained or entirely absent.

Many residents would be unable to travel to employment, education and other services by public transport within the times typically required for modern working and living patterns. For example, journeys to major employment destinations such as Bluewater, Gravesend and rail stations serving London would often be met with limited departure opportunities and, in some cases, would not enable arrival before typical employment start times or return following the completion of a standard working day. Whilst such journeys may be technically possible, KCC does not consider that the available bus provision would represent an attractive, convenient or realistic alternative to private car travel for a substantial proportion of residents.

The limitations of the existing bus network are particularly important given the site's wider accessibility constraints. As set out elsewhere in this response, opportunities for walking and cycling to key destinations are limited and unattractive for many users. Consequently, residents would be heavily reliant on public transport if travel by private car is to be reduced. However, the current level of bus provision is insufficient to achieve this objective and, without substantial enhancements to service frequency, operating hours and long-term viability, the development would remain highly dependent on the private car for many day-to-day journeys.

KCC's 2026 Public Transport Note: 'Developments in Istead Rise and Meopham' identifies that the 308 currently requires public subsidy and is not commercially sustainable based on passenger demand and fare income alone. The note also states that the continuation of the existing 306/308 service cannot be assumed in the long term and concludes that the area is unsuitable for development of any scale without considerable improvement to public transport provision. Meopham Railway Station is located approximately 6km from the site, and many of the services noted in the 'local facilities' section are located within Meopham village centre. Should the 308 service be withdrawn, residents would be located too far from the station (and Meopham village centre) to walk and, for the reasons set out elsewhere in this response, many would be unlikely to cycle. Access would therefore be heavily reliant upon the private car.

KCC's Public Transport Team identified that future development along the A227 corridor within rural Gravesham would need to contribute towards enhancing the local public transport offer, by increasing service frequency, extending operating hours, introducing Sunday services and providing additional school transport capacity. The cost of delivering this level of public transport provision was identified as between approximately £2.55 million and £3.8 million over a five-year period, depending on the KCC subsidy available at the time.

The applicant was made aware of the requirements at the pre-application stage, yet no contribution has been proposed. As such, the development is proposed rely upon the existing public transport network, which the applicant has not demonstrated is capable of providing a realistic and attractive alternative to private car use. KCC therefore remains concerned that the proposal would generate a predominantly car-based pattern of movement and would not provide a genuine choice of transport modes for many future residents.

Should permission nevertheless be granted, a financial contribution towards local public transport improvements would be required to help mitigate the impact of the development. However, the provision of such a contribution would not remove KCC's concerns regarding the site's overall accessibility and dependence upon private car travel.

Furthermore, even if a contribution were secured, given the limited amount from a development of this size, there is no certainty that future occupiers would experience any meaningful improvement in public transport provision in the short term. Delivery of the wider public transport strategy is dependent upon contributions from multiple developments and the timing of those developments coming forward. As a result, future residents could occupy the development for a prolonged period whilst continuing to rely upon a limited public transport network, resulting in a predominantly car-based pattern of travel from the outset.

Local Facilities

The nearest day-to-day facilities to the site are limited to a small number of local services including Vigo Primary School and the Culverstone Green post office/convenience store. Whilst the post office/convenience store (and Culverstone Green Primary School, which is not mentioned in the report) are located approximately 850m from the site, the route is not considered suitable for all users. The footway is constrained in width, unlit and is severed in places which requires multiple road crossings, which is not convenient and for which no formal crossing facilities are provided. Sections of the route are also surfaced in grass or loose material rather than a suitable all-weather pedestrian surface. As a result, whilst a physical

route exists to these facilities, it cannot reasonably be described as a high-quality walking environment.

Beyond these facilities, the majority of destinations likely to generate regular day-to-day journeys are located considerably further from the site. The applicant identifies destinations including dental facilities (approximately 2.8km), Meopham Medical Centre (approximately 3.9km), Meopham Secondary School (approximately 4km), a church (approximately 4.3km) and a supermarket (approximately 10.5km). These distances are such that walking is unlikely to be a realistic option for most trips. Whilst they could theoretically be accessed by cycle, KCC does not consider the surrounding highway network to provide an attractive, realistic or safe cycling environment for a broad range of users.

Future residents would remain heavily reliant upon the private car for access to employment opportunities, healthcare facilities, rail services, secondary education, higher-order retail provision and a wider range of services and facilities.

Vehicular Access

Vehicular access is proposed to be taken from Newlands Lane, as shown on the 'Junctions and Visibility' drawing, ref. 634802. The existing Newlands Lane would be diverted into the site and a new priority junction formed to the east. However, KCC has concerns regarding the proposed layout, particularly the acute angle of the junction and the need to provide a clear, legible and intuitive arrangement for all road users. A Road Safety Audit and Designer's Response is required to demonstrate that the proposed junction arrangement is safe, self-explaining and capable of accommodating all anticipated vehicle movements without introducing unacceptable highway safety risks. As access is not reserved, these matters cannot be deferred and must be resolved as part of the current application.

Vehicle tracking has been undertaken and can be seen on the 'Vehicle Tracking (Refuse)' drawing, ref 634803, in Appendix C. However, this is for the internal roads only, rather than the access points which form part of the application. A plan showing the refuse vehicle accessing and egressing the site from the A227 and at the diverted Newlands Lane junction, is required. Given the angle of approach, this must include vehicles travelling between the existing Newlands Lane and the internal access road.

Visibility splays of 90.7 metres to the north and 94 metres to the south are shown on the 'Junctions and Visibility' drawing, ref. 634802. However, the visibility assessment has been derived using a Manual for Streets methodology despite the recorded 85th percentile speeds of 43.9mph (70.7kph) northbound and 42.9mph (69.0kph) southbound exceeding the 60kph threshold above which Manual for Streets advises that DMRB may be more appropriate. KCC therefore considers that visibility splays for the A227 should be derived using a DMRB methodology and the submitted plans updated accordingly.

The recorded 85th percentile speeds on Newlands Lane of 26.7mph eastbound and 28.5mph westbound demonstrate that the use of a Manual for Streets methodology is appropriate. However, given the proposed changes to Newlands Lane, the visibility splays should be based upon the posted speed limit rather than existing surveyed speeds. Assuming a 30mph speed limit, this would require visibility splays of 43m in each direction. The submitted drawings should therefore be amended accordingly.

Newlands Lane has a constrained width and lacks formal passing points, yet the annotation on the 'Junctions and Visibility' drawing, ref. 634802 states that the "*Road Width [is] to Remain at Current Width*". The applicant identifies Vigo Primary School as a local destination and, whilst KCC does not consider the wider walking and cycling network to be suitable for everyday journeys, there is nevertheless an opportunity to improve part of the route. In particular, on the section of Newlands Lane falling within the application boundary,

consideration should be given to localised widening and the provision of a footway to improve conditions for pedestrians.

Due to the lack of onward pedestrian infrastructure and the constrained nature of the surrounding highway network, such measures would not overcome the site's wider accessibility concerns or render the development sustainable. However, should the Local Planning Authority be minded to grant permission, these works would provide a modest improvement to part of the route and increase its attractiveness for pedestrian movements.

KCC would ordinarily expect developments of this scale to provide a secondary access for emergency purposes. This is typically achieved through a minimum 3 metre wide access, designed to prevent use by general vehicular traffic (for example through the use of bollards) whilst remaining available to emergency vehicles, pedestrians and cyclists. For this proposal, a secondary emergency access could potentially be achieved through a connection to the A227. Should the main access become blocked for any reason, this would provide an alternative route for residents or emergency vehicles to enter or leave the site. Kent Fire and Rescue Service should therefore be consulted to confirm whether the proposed arrangement is acceptable and whether an emergency access should be provided.

Should permission be granted, the existing accesses onto the A227 and Newlands Lane that are no longer required must be permanently stopped up where appropriate and the footway/verge and kerb line reinstated.

As identified at the pre-application stage, there appears to be a discrepancy between the application red line boundary on Newlands Lane shown on the Block Plan and the high-level highway boundary information held by KCC. This should be reviewed and the correct position confirmed, particularly if the internal road network is not proposed for adoption.

Crash Data Assessment

A crash data assessment has been undertaken for the 'most recent five-year period'; however, the dates covered by the assessment have not been stated and the robustness of the analysis cannot therefore be verified. The assessment identifies two serious collisions and one slight collision on the A227, together with additional slight collisions on Newlands Lane. However, only two of these collisions have been discussed within the assessment. It is therefore unclear whether all relevant highway safety issues have been fully considered. Further information should be provided regarding the circumstances and contributory factors associated with the collisions, together with an assessment of whether the proposed development would increase the likelihood or severity of similar incidents occurring in the future.

Vehicle and Cycle Parking

Parking is proposed in accordance with the KCC Parking Standards (2025) and this is generally acceptable. Whilst parking would be considered as part of any subsequent reserved matters application, it is noted that the proposals include a total of 108 spaces, including 13 visitor spaces. However, this provision does not accord with the standards for rural locations, which, for example, require four-bedroom and larger dwellings to be provided with three parking spaces.

In addition, the TS states that “...*tandem parking has been kept to a minimum and is only proposed in visitor parking areas.*” KCC does not consider tandem parking to be appropriate for visitor parking, as the users of such spaces are unlikely to be known to one another and cannot reasonably be expected to coordinate vehicle movements. Visitor parking spaces should therefore be independently accessible.

Each dwelling is proposed to be provided with a garden shed capable of accommodating secure cycle parking. However, the applicant states that cycle storage will be provided “*should*

it be required." In accordance with the standards, cycle parking should be provided at a rate of one space per bedroom. Where cycle parking is to be accommodated within a garden shed, it should be demonstrated that the structure is of sufficient size to accommodate the required number of cycles whilst retaining adequate space for normal domestic storage. In addition, residents should be able to access the highway from the cycle store without the need to wheel or carry cycles through the house. These matters should be addressed through any subsequent reserved matters application, should planning permission be granted.

Electric vehicle charging should be provided in line with part S of the Building Regulations.

Trip Generation, Distribution, and Junction Capacity

The proposals have been assessed using the traditional 'predict and provide' approach, rather than the 'vision-led' or 'decide and provide' approach advocated by the NPPF.

A TRICS assessment has been undertaken to estimate the number of vehicle trips likely to be generated by the development during the network peak hours. However, KCC does not agree that the site selection criteria used to derive the trip rates are sufficiently robust. In particular, the range of dwelling numbers selected is considered overly restrictive, surveys extending back to 1987 have been included, and the criteria relating to population and car ownership characteristics have not been justified as being representative of the proposed development. Furthermore, the assessment assumes a suburban location type, which KCC does not consider appropriate for this rural site. The selected criteria result in only a single comparator site being identified. This survey is over ten years old and benefits from a higher level of public transport provision than is available at the application site. It is therefore not considered wholly representative.

Notwithstanding these concerns, the resulting trip rates indicate that the development would generate approximately 50 two-way vehicle movements during the AM peak hour and 59 two-way vehicle movements during the PM peak hour. Having undertaken a high-level review of comparable TRICS data, KCC considers these forecasts to be broadly reasonable for a development of this scale.

Whilst the predicted traffic generation is considered broadly reasonable, no traffic distribution information has been provided. It is therefore unclear how development traffic would be distributed across the local highway network, including the proportion of trips anticipated to travel northbound and southbound on the A227. This information would assist in understanding the interaction of development traffic with the A227/Newlands Lane junction, particularly when considered alongside other committed and proposed developments within the area that are expected to increase traffic flows on the A227 and may reduce opportunities for vehicles to emerge onto the A227 from Newlands Lane, or increase delays to vehicles on the A227. In the absence of this information, it is not possible to fully assess the impact of the development on nearby junctions or determine whether further assessment of junction operation would be required.

In addition, no person trip generation assessment has been provided. Consequently, the anticipated number of trips by walking, cycling, public transport and private car is unknown. This omission is particularly important given the applicant's conclusions regarding sustainable travel and the suitability of non-car modes. Without this information, the extent to which the development is likely to rely upon private car travel cannot be fully assessed. Person trip generation should be considered in the context of the existing infrastructure and facilities available to new residents.

Travel Plan

The scale of the proposed development does not meet the threshold for a Travel Plan as set out in KCC's 'Transport Assessments and Travel Plans Guidance'. However, in accordance

with that guidance, KCC recommends that a Travel Information Pack be prepared and provided to each dwelling upon first occupation. The pack should promote sustainable travel choices and provide information on local walking, cycling and public transport opportunities. However, whilst this would assist in raising awareness of available travel options, it would not address the wider accessibility concerns identified elsewhere in this response.

Policy

The submitted TS and Planning Statement have been prepared with reference to the 2025 National Planning Policy Framework. However, the application will be determined against the August 2026 Framework, which places considerable emphasis on locating development in sustainable locations, providing a genuine choice of transport modes, reducing reliance upon private car travel and promoting sustainable patterns of movement.

Policy TR3 (Locating Development in Sustainable Locations) requires development generating a significant amount of movement to be located in a sustainable location which limits the need to travel, particularly by private car, offers a genuine choice of transport modes and supports sustainable patterns of movement. Whilst a small number of local facilities are available within Culverstone Green, KCC's concern is not that opportunities to walk, cycle or travel by public transport are entirely absent, but that the available options do not represent realistic, attractive and convenient alternatives to the private car for many day-to-day journeys.

The existence of some opportunities to walk, cycle or travel by public transport does not, in itself, amount to a genuine transport choice. Future residents would remain heavily reliant upon the private car for access to employment opportunities, healthcare facilities, rail services, secondary education, higher-order retail provision and a wider range of services and facilities. KCC therefore considers that the proposal would fail to promote sustainable patterns of movement and would not comply with Policy TR3.

Policy TR4 (Street Design, Access and Parking) seeks to ensure development provides safe, attractive and inclusive opportunities for travel and effective connections both within the local area and with neighbouring areas. Whilst the application proposes improvements to pedestrian connectivity, KCC remains concerned regarding the quality of walking, cycling and public transport connections to a range of destinations and the extent to which they would be attractive and convenient for different users, particularly during hours of darkness and throughout the year. KCC is therefore not satisfied that the development would fully achieve the objectives of Policy TR4.

Policy TR6 (Assessing Transport Impacts) requires promotion of sustainable travel and likely travel behaviour arising from the development. Whilst a TS has been submitted, KCC is not satisfied that the assessment demonstrates that future residents would have realistic and attractive alternatives to private car travel. Significant sections of the pedestrian and cycling network would remain sub-standard and existing public transport provision remains limited.

Policies CC2 (Mitigation of Climate Change) and DP3 (Key Principles for Well-Designed Places) seek to reduce transport-related emissions, minimise reliance on private car travel and support sustainable movement and connectivity. Given the site's location and the limitations of the walking, cycling and public transport network, KCC considers that future residents would remain heavily reliant upon private car travel for a substantial proportion of day-to-day journeys. The proposal would therefore conflict with the objectives of these policies.

As compliance with Policy TR3 forms a specific requirement of Policy GB7(1)(g)(iii), KCC is not satisfied that the applicant has demonstrated that the proposal occupies a sustainable location for the purposes of the Grey Belt exception.

Gravesham Core Strategy Policy CS01 seeks to promote sustainable patterns of development and reduce the need to travel, particularly by private car. Policy CS11 seeks to ensure development is supported by a safe, sustainable and integrated transport system and that opportunities for walking, cycling and public transport are maximised. Paragraph 2.6.4 of the Core Strategy further seeks development in locations with the best access to services and facilities and which minimise the need to travel by car. For the reasons outlined above, KCC remains concerned that future residents would remain heavily reliant upon private car travel for a substantial proportion of day-to-day journeys and that the available walking, cycling and public transport opportunities do not provide a genuine choice of transport modes. The proposal is therefore considered to conflict with the objectives of these policies.

The proposal is also contrary to the objectives of Kent County Council's Local Transport Plan 5, which promotes modal shift away from private car use, and the Gravesham Design Code, which promotes improved walking, cycling and public transport connectivity within rural areas.

Trees

The trees proposed for removal are shown on the 'Trees to be Removed' drawing, Ref. 004 Rev A. However, it is unclear whether only the trees shaded red are proposed to be removed, or whether the trees identified by red circles are also affected. Clarification is required, particularly as several of the circled trees appear to lie within or immediately adjacent to highway land.

KCC does not normally support the removal of highway trees. Should any trees within highway land be affected by the proposals, the applicant will be required to provide appropriate justification and obtain the necessary approvals. Any agreement to remove highway trees would be exceptional and may result in significant costs being incurred by the applicant.

Conclusion

KCC acknowledges the efforts made by the applicant to improve the accessibility of the site. However, KCC remains concerned that the proposal fails to address the site's fundamental locational constraints.

Even having regard to the rural context of the site, future residents would remain heavily reliant upon the private car for access to employment opportunities, healthcare facilities, secondary education, rail services, higher-order retail provision and a wider range of services and facilities. KCC does not consider that the proposed mitigation, or a financial contribution towards bus services, should one be secured, overcomes these fundamental accessibility and connectivity constraints.

A financial contribution towards public transport cannot, in itself, make an inherently unsustainable location sustainable.

KCC therefore considers that the proposal would fail to provide a genuine choice of transport modes, would not promote sustainable patterns of movement and would result in a predominantly car-based pattern of development. KCC is therefore not satisfied that the site represents a sustainable location in transport terms and objects to the application on the grounds that it is contrary to Policies TR3, TR4, TR6, DP3, CC2 and GB7(1)(g)(iii) of the NPPF, Policies CS01 and CS11 of the Gravesham Core Strategy, the objectives of KCC Local Transport Plan 5 and the Gravesham Design Code.

Should the Local Planning Authority be minded to grant planning permission contrary to this recommendation, KCC would request the opportunity to discuss the planning conditions and obligations required to help mitigate the impact of the development, including a financial contribution towards improvements to local bus services on the A227 corridor consistent with other developments within the area.

It is important to note that Local Planning Authority (LPA) permission does not convey any approval to carry out works on or affecting the public highway.

Any changes to or affecting the public highway in Kent require the formal agreement of the Highway Authority, Kent County Council (KCC), and it should not be assumed that this will be a given because LPA planning permission has been granted.

For this reason, anyone considering works which may affect the public highway, including any highway-owned street furniture or landscape assets such as grass, shrubs and trees, is advised to engage with KCC Highways and Transportation at an early stage in the design process.

Across the county there are pieces of land next to private homes and gardens and near the highway that do not look like roads or pavements but are actually part of the public highway.

Some of this highway land is owned by Kent County Council whilst some is owned by third party owners. Irrespective of the ownership, this land may have 'highway rights' over the topsoil.

Works on private land may also affect the public highway. These include works to cellars, to retaining walls which support the highway or land above the highway, and to balconies, signs or other structures which project over the highway. Such works also require the approval of the Highway Authority.

Kent County Council has now introduced a pre-application advice service in addition to a full formal technical approval process for new or altered highway assets, with the aim of improving future maintainability. Further details are available on our website below:

<https://www.kent.gov.uk/roads-and-travel/highway-permits-and-licences/highways-permissions-and-technical-guidance>.

This process applies to all development works affecting the public highway other than applications for vehicle crossings, which are covered by a separate approval process. Further details on this are available on our website below:

<https://www.kent.gov.uk/roads-and-travel/highway-permits-and-licences/apply-for-a-dropped-kerb/dropped-kerb-contractor-information>

Once planning approval for any development has been granted by the LPA, it is the responsibility of the applicant to ensure that before development commences, all necessary highway approvals and consents have been obtained, and that the limits of the highway boundary have been clearly established, since failure to do so may result in enforcement action being taken by the Highway Authority.

The applicant must also ensure that the details shown on the approved plans agree in every aspect with those approved under the relevant legislation and common law. It is therefore important for the applicant to contact KCC Highways and Transportation to progress this aspect of the works prior to commencement on site.

Further guidance for applicants, including information about how to clarify the highway boundary and links to application forms for vehicular crossings and other highway matters, may be found on Kent County Council's website:

<https://www.kent.gov.uk/roads-and-travel/highway-permits-and-licences/highways-permissions-and-technical-guidance>. Alternatively, KCC Highways and Transportation may be contacted by telephone: 03000 418181.

Yours faithfully

Director of Highways & Transportation

*This is a statutory technical response on behalf of KCC as Highway Authority. If you wish to make representations in relation to highways matters associated with the planning application under consideration, please make these directly to the Planning Authority.