



National Highways Planning Response (NHPR 25-01) Formal Recommendation to an Application for Planning Permission

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To: Gravesham Borough Council (FAO Lisa Fisher)
planning.reps@gravesham.gov.uk

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

Council's Reference: 20250013

Location: Land to the north and south of Station Road, Southfleet, Gravesend, Kent DA11 8HX

Proposal: Proposed construction, operation and maintenance of a Battery Energy Storage System (BESS) with associated infrastructure (including batteries in storage containers, a substation and inverters) and works including highway access, landscaping and biodiversity enhancements.

National Highways Ref: NH/25/09820

Referring to the consultation on a planning application dated 30 January 2025 referenced above, in the vicinity of the A2 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)~~

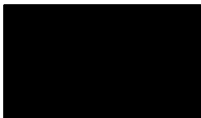
Highways Act 1980 Section 175B is not relevant to this application.¹

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: 18 February 2025				
<table style="width: 100%; border-collapse: collapse;"><tr><td style="width: 50%; vertical-align: top;">Name: Nigel De Wit</td><td style="width: 50%; vertical-align: top;">Position: Assistant Spatial Planner</td></tr><tr><td colspan="2" style="padding-top: 10px;">National Highways Bridge House, 1 Walnut Tree Close, Guildford, Surrey, GU1 4LZ www.nationalhighways.co.uk</td></tr></table>			Name: Nigel De Wit	Position: Assistant Spatial Planner	National Highways Bridge House, 1 Walnut Tree Close, Guildford, Surrey, GU1 4LZ www.nationalhighways.co.uk	
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¹ Where relevant, further information will be provided within Annex A.

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.

Recommend 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 and efficient operation of the SRN, in this case, particularly within the vicinity of the A2.

Given the nature, scale, and location of the proposal, we are satisfied that during the operational stage this development, if permitted, would not have a significant impact on the SRN, in this case the A2.

We welcome the submission of the Safety Risk Assessment (SRA) which we have reviewed and are satisfied with. As highlighted in section 7 of the submitted SRA, the Assessment will need to be kept under review as the project progresses.

The proposal of Horizontal Directional Drilling (HDD) under the A2 means that the applicant must assess, prior to the commencement of construction, the geotechnical risk in accordance with the Design Manual for Roads and Bridges (DMRB) document '**CD 622 - Managing geotechnical risk**'. This document is available online:

<https://www.standardsforhighways.co.uk/search/ff5ed991-71ed-4ff2-9800-094e18cd1c4c>.

We have recommended an appropriate condition to deal with this matter.

We envisage the SRN being a likely route for construction and decommissioning traffic and we have therefore recommended appropriate conditions addressing these matters.

Having assessed application 24/01470/FUL, we are content that the proposal, if permitted, would not have an unacceptable impact on the safety, reliability, and/or operational efficiency of the Strategic Road Network in the vicinity of the site (A2) provided that the following conditions are imposed, reflecting DfT Circular 01/2022 and NPPF 2024 paras. 115-118:

1. Geotechnical Assessment

Condition: Prior to the commencement of the development hereby permitted a geotechnical assessment compliant with the Design Manual for Roads and Bridges document CD 622 shall be submitted to and approved in writing by the Local Planning Authority (in consultation with the Highway Authority for the A2).

Reason: To mitigate any adverse impact from the development on the A2 in accordance with DfT Circular 01/2022.

2. Construction Traffic Management Plan

Condition: Prior to the commencement of the development hereby permitted a comprehensive Construction Traffic Management Plan (CTMP) shall be submitted to and approved in writing by the Local Planning Authority (in consultation with the Highway Authority for the A2). The plan shall include as a minimum:

- Construction phasing
- Construction routing plans
- Permitted construction traffic arrival and departure times
- Management of loose loads
- Cleaning of construction vehicles on-site

Thereafter all construction activity in respect of the development shall be undertaken in full accordance with such approved details unless otherwise approved in writing by the Local Planning Authority in consultation with the Highway Authority.

Reason: To mitigate any adverse impact from the development on the A2 in accordance with DfT Circular 01/2022.

3. Decommissioning Traffic Management Plan

Condition: Prior to the decommissioning of the development hereby permitted a comprehensive Decommissioning Traffic Management Plan (DTMP) shall be submitted to and approved in writing by the Local Planning Authority (in consultation with the Highway Authority for the A2). The plan shall include as a minimum:

- Decommissioning phasing
- Decommissioning routing plans
- Permitted decommissioning traffic arrival and departure times
- Management of loose loads
- Cleaning of decommissioning vehicles on-site

Thereafter all decommissioning activity in respect of the development shall be undertaken in full accordance with such approved details unless otherwise approved in writing by the Local Planning Authority in consultation with the Highway Authority.

Reason: To mitigate any adverse impact from the development on the A2 in accordance with DfT Circular 01/2022.

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.