



**Gravesham Borough Council
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Highways and Transportation
Kroner House
Eurogate Business Park
Ashford
TN24 8XU
Tel: 03000 418181
Date: 30 July 2026
Our Ref: AC

Application -	GB/20260153
Location -	Dene Holm House, Dene Holm Road, Northfleet, Gravesend Kent
Proposal -	Demolition and replacement of a care home with a new build C2 use care facility development comprising of 60 en suite residential bedrooms and erection of a building to provide 6 rehabilitation apartments with associated amenity spaces, inside and outside the building footprint.

Introduction

The application proposes the demolition of the existing care home and the erection of a replacement 60-bedroom care facility together with six rehabilitation apartments.

Further clarification is required regarding the operation of the proposed rehabilitation apartments. In particular, confirmation should be provided as to whether these units are intended solely for use by residents associated with the care facility or whether they may operate independently. The applicant should demonstrate that any associated highway, parking and trip generation impacts have been appropriately assessed.

The application is supported by a Transport Statement prepared by Velocity Transport Planning (January 2026), which is generally considered to be robust.

Site Location and Sustainability

The site is located in a relatively sustainable location, within walking distance of local amenities and services and with access to nearby bus stops served by regular public transport services. Given the nature of the proposed development, it is anticipated that the majority of trips will be associated with staff, visitors and servicing activity.

It is appropriate that a Travel Plan is secured by condition to encourage staff to travel by sustainable modes where possible.

Whilst not a highway safety issue, consideration should be given to simplifying the internal pedestrian routes within the site. A more direct footway layout may be beneficial for future residents, many of whom may have reduced mobility.

Site Access

Dene Holm Road

The proposed development will be served by a new access from Dene Holm Road in broadly the same location as the existing access, with the existing egress arrangement being permanently closed.

The proposed access is acceptable in principle, however, the works within the public highway will require the applicant to enter into a Section 278 Agreement with Kent County Council Highways and Transportation

Visibility splays measuring 2.4m x 43m have been demonstrated and are appropriate for the posted 30mph speed limit. These splays should be maintained thereafter, with no obstruction exceeding 0.6m in height above carriageway level.

Pedestrian visibility splays measuring 2m x 2m should also be provided on both sides of the access. These should be drawn behind the back edge of the footway and maintained free from obstruction exceeding 0.6m in height.

Tensing Avenue

It is proposed to retain the existing access from Tensing Avenue to serve the ambulance bay, cycle parking and refuse storage area.

Concerns are raised regarding the suitability of this arrangement. Insufficient information has been provided to demonstrate that ambulance access, refuse collection activities and cycle parking can operate safely and efficiently without conflict between users.

A Traffic Regulation Order (TRO) is proposed to introduce waiting restrictions on Tensing Avenue between 07:00 and 17:00. Whilst noted, the applicant should be aware that the implementation of a TRO cannot be guaranteed through the planning process. Consequently, the development should not be reliant upon the introduction of waiting restrictions in order to operate acceptably.

The applicant should therefore explore alternative arrangements for ambulance servicing, refuse storage and collection.

Swept path analysis should be provided for an 11.4m refuse vehicle demonstrating safe access to, manoeuvring within and egress from the site. The analysis should demonstrate that refuse collection can be undertaken without reliance on the proposed TRO.

In addition, the cycle parking and refuse storage should be separated from the ambulance bay to ensure that access to these facilities is not impeded when the ambulance space is occupied.

Rehabilitation Apartment Access

A separate access is proposed from Tensing Avenue to serve six parking spaces associated with the rehabilitation apartments.

Given the limited number of parking spaces served by this access, the proposed bellmouth arrangement appears excessive. A standard vehicle crossover arrangement is likely to be more appropriate.

Whilst visibility splays measuring 2.4m x 43m have been demonstrated, pedestrian visibility splays measuring 2m x 2m should also be provided on both sides of the access.

Trip Generation

TRICS data has been submitted to assess the likely trip generation associated with the proposed development.

The assessment indicates that the development would result in only a marginal increase in vehicle movements when compared with the existing lawful use of the site, with increases limited to approximately two to three two-way vehicle trips during both the AM and PM peak hours.

I am satisfied that the submitted assessment demonstrates that the traffic impact of the proposal would not be severe and would not result in a material impact on the operation of the local highway network.

Personal Injury Collision Record

The submitted collision analysis indicates that recorded injury collisions are dispersed across the wider highway network and are concentrated around nearby junctions. No recorded injury collisions are identified at the site access.

Whilst no immediate highway safety concerns are identified from the information submitted, the full collision records should be provided for review, in order to verify the conclusions presented within the Transport Statement.

Parking

Kent Vehicle Parking Standards recommend one car parking space per resident staff member, one space per two non-resident staff members and one visitor space per six residents.

The Transport Statement demonstrates that the proposed provision of 25 parking spaces accords with these standards and is therefore considered acceptable.

The inclusion of two accessible parking spaces is welcomed; however, the applicant may wish to review the level and location of accessible parking provision, particularly in relation to the rehabilitation apartments, given the nature of the proposed use.

Electric Vehicle charging infrastructure should be provided in accordance with current Building Regulations requirements.

Whilst provision has been made for ambulance parking, the suitability of the proposed location should be reviewed for the reasons outlined above.

Cycle Parking

Cycle parking should be provided at a minimum rate of one space per 10 beds. The proposed provision of 10 cycle parking spaces is therefore acceptable in principle. Details should be provided to demonstrate that the cycle parking is secure, covered and conveniently located for staff and visitors.

I look forward to additional information being provided, to assist me in determining this application from a highway perspective

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.