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Highways and Transportation
Kroner House
Eurogate Business Park
Ashford
TN24 8XU
Tel: 03000 418181
Date: 1 October 2026
Our Ref: AC

Application -	GB/20260286
Location -	St Johns Ambulance, Northfleet Ambulance Station, Eric Harden VC Memorial Hall, Hall Road Northfleet
Proposal -	Change of use of building to a nursery.

Thank you for your further consultation in relation to the above planning application. I have the following comments to make with respect to highway matters:

Having reviewed the submitted Travel Plan, I have set out below a number of comments and recommendations. In its current form, the document requires significantly more detail and supporting information.

A Travel Plan should function as a comprehensive, standalone document that clearly identifies all site-specific travel opportunities, constraints, measures, targets, and monitoring arrangements. It should provide sufficient information for users and stakeholders without the need to refer to multiple external documents and should establish a framework for continual review and improvement.

I have the following comments and recommendations to ensure the document provides a robust and effective framework for promoting sustainable travel to and from the nursery:

- **Bus Services:** Please provide further information regarding the proximity of local bus stops to the site, including walking distances and routes. Details of available services, destinations, frequencies, and ticketing options should also be included, together with links to the relevant bus operators' websites.
- **Rail Services:** Please provide details of the nearest railway station, including its distance from the site and available walking, cycling, or public transport connections. Information on destinations served, service frequencies, ticketing options, and a link to the relevant rail operator's website should also be included.
- **Walking:** A map illustrating the local Public Rights of Way (PROW) network and pedestrian infrastructure should be incorporated into the Travel Plan. This should be accompanied by a brief description of local walking routes, including details of footpaths, safe crossing points, street lighting provision, and pedestrian accessibility to key destinations.

- **Cycling:** Please include a map showing local cycling infrastructure and routes in the vicinity of the site. Further details should also be provided regarding the quantity, location, and specification of cycle parking facilities proposed for staff and visitors.

- **Staff Travel:** Clarification is required regarding staffing arrangements, including whether staff will work full-time hours and how this relates to the proposed minibus operation. The Travel Plan should also identify measures to encourage sustainable staff travel, such as participation in Cycle to Work schemes, car-sharing initiatives, public transport incentives and other relevant measures.

- **Parking Provision:** Given the limited provision of four parking spaces, please clarify whether Electric Vehicle (EV) charging facilities and designated accessible parking bays will be provided. Details of their location and management should also be included.

- **Drop-off and Pick-up Arrangements:** I have concerns regarding the proposed 10-minute parking limit for drop-off and pick-up activities. In practice, parents are unlikely to be able to accurately predict traffic conditions or account for unforeseen circumstances associated with travelling with young children. Consideration should therefore be given to whether this arrangement is realistic, practical, and capable of effective implementation.

- **Minibus Service:** Further information is required regarding the proposed minibus service, including vehicle capacity, operating arrangements, routes, management responsibilities, and any associated Service Level Agreement. This information is necessary to assess whether the proposal is realistic, deliverable and likely to be effective.

- **Parent Travel Behaviour Agreement:** Please provide a copy of the proposed Parent Travel Behaviour Agreement. In addition, further clarification is required regarding how compliance with the agreement will be monitored and enforced.

- **School Peak-Time Interaction:** The Travel Plan should assess the potential impact of the nursery's arrival and departure times coinciding with those of the grammar school located opposite the site. Consideration should be given to the cumulative transport and parking impacts that may arise during peak periods.

- **On-Street Parking:** Whilst the Travel Plan suggests that parents may utilise on-street parking within the surrounding area, there is concern that this could result in displacement parking and increased inconvenience for nearby residents. Appropriate communication, monitoring, and mitigation measures should therefore be identified.

- **Travel Plan Coordinator:** The Travel Plan should identify the appointed Travel Plan Coordinator, including their name, position, and contact details, prior to first occupation of the development.

- **Travel Surveys:** Copies of the proposed staff and parent travel surveys should be provided prior to occupation to ensure that the information collected will be suitable for establishing baseline travel patterns and supporting future monitoring and review.

- **Additional Sustainable Travel Measures:** The Travel Plan would benefit from the inclusion of further initiatives aimed at encouraging sustainable travel by parents and children. Examples may include regular travel-focused newsletters, information boards, sustainable travel promotional events, reward and incentive schemes for children, scooter parking facilities, walking buses, and other measures designed to reduce reliance on private car use.

Overall, whilst the Travel Plan contains a number of positive measures, further detail and clarification are required to demonstrate that the proposed arrangements are realistic,

deliverable, and capable of achieving a meaningful shift towards sustainable travel modes. Once this additional information has been submitted, further highway comments can be provided.

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.