

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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National Highways
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To: Gravesham Borough Council (FAO Mrs Lisa Fisher)
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CC: transportplanning@dft.gov.uk
spatialplanning@nationalhighways.co.uk

Council's Reference: 20260131

Location: Site Of Former Police Station 133 Windmill Street Gravesend Kent
DA12 1DB

Proposal: Full Application: Erection of 67 Retirement Living Apartments for older people (comprising 67no. 1 bedrooms) including communal facilities, access, car parking and landscaping.

National Highways Reference: NH/26/15094

National Highways Case Officer: Kevin Bown

Referring to the consultation on a planning application dated 13 February 2026 referenced above, in the vicinity of the M2 and A2 (Trunk Road) near the Gravesend that form part of the Strategic Road Network, notice is hereby given that National Highways' formal recommendation is as follows:

- 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 2026

Name: Kevin Bown

Position: Spatial Planner

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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

We have reviewed the application from the National Highways/ Strategic Road Network (SRN) perspective. We note that

- the site is located approximately 1 3/4 miles from the nearest SRN junction: A2/A227, that is likely to be impacted by construction and/or development traffic
- the site is currently vacant, previously developed land, with the last use having been a Police Station
- the site was previously consented as follows

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Demolition of existing structures on site and the erection of 75 Retirement Living apartments for older people (comprising 48 no. 1-bed and 27 no. 2-beds) including communal facilities, access, car parking and landscaping.

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Former Police Station 133 Windmill Street Gravesend Kent

National Highways, while not necessary agreeing with the transport evidence, were content that the development would not have an unacceptable impact on the SRN and hence had No Objection to the development

The consent was not taken up.

- The current application is supported by a Transport Statement. It focusses solely on the local road network, rather than assessing SRN impacts.

Based on the above and all material considerations from the NH/SRN perspective

- The application documents contain sufficient information to facilitate our assessment of the likely development impacts on the SRN
- While others (particularly KCC highways) may have comments on the documents, such as the TS, we are content that even if some aspects changed, our overall conclusions would not need to change.
- Given the planning history of the site, its distance of the site from the SRN, the currently proposed level of trips and their likely timing spread across the day, we are content that the development would not have an unacceptable impact on the safety, reliability and or operational efficiency of the SRN (the tests set out in DfT C1/22 and MHCLG NPPF).
- We are also content that from the SRN perspective no mitigations or conditions are necessary.

We therefore have **No Objection** to application 20260131.

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.