



Gravesham Borough Council

Civic Centre
Windmill Street
Gravesend
Kent
DA12 1AU

Highways and Transportation

Kroner House

Eurogate Business Park
Ashford

TN24 8XU

Tel: 03000 418181

Date: 25 June 2024

Our Ref: AC4DB

Application - GB/20240473

Location - Kesson House Care Home , Council Avenue, Northfleet, Gravesend Kent

Proposal - Demolition of Annex and Extension to the original Kesson House. Erection of extension to Kesson House and use of building as 9 x 1 bedroom units for supported living use and overnight staff accommodation (Class C3b). Erection of 4 x 1 bed flats and 16 x 2 bed flats (Class C3a) in two separate blocks, hard and soft landscaping, parking spaces and cycle storage.

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

A crash data assessment has been undertaken using crashmap which holds data to 2022. This is out of date and should be updated to 2024. Data can be obtained from crashdata@kent.gov.uk.

Paragraphs 3.4 - 3.6 refer to cycle facilities within the vicinity of the site. Whilst not referred to in the document, the KCC Green Corridors site 11 scheme will run past the site to the north. The scheme aims to reallocate road space to widen footways and provide shared cycle facilities on the High Street between College Road and Vicarage Drive, and construction is expected to start towards the end of 2024 / early 2025. This will further enhance cycle access to the site.

The provision of six vehicle parking spaces for the 10x sheltered accommodation units is in line with standards and is acceptable.

Table 4.1 states the parking standard for the residential units is one space per unit. However, SPG4 states one space per one bedroom dwelling and two spaces per two and three bed dwellings. According to paragraph 1.1 of the planning statement, the 20 residential units will comprise 5x one bed flats and 15x two bed flats. This would equate to a parking requirement of 35 spaces.

15 (unallocated) spaces are proposed for the 20 units, which the applicant states is in line with 2011 census data for this ward, with any "*overspill visitor parking accommodated within the local highway network*". The Census data is 13 years old and may therefore be out of date. There is evidence of vehicles parking on street currently (despite the presence of driveways) and parking both partially and wholly on the footways surrounding the site, suggesting existing parking issues which are likely to be exacerbated by any overspill parking. The site should accommodate the anticipated demand and not rely on on-street parking.

IGN3 states 20% of the units should have visitor parking, which would equate to six spaces. The Applicant proposes to provide two spaces.

The proposed parking provision is not considered to adequately cater for the predicted demand and should be increased.

Two of the spaces are to be allocated for disabled use. In line with DfT's Inclusive Mobility Guidance, these spaces should have 1.2m hatching to both the side and rear of the bay.

SPG4 requires one cycle parking space per five units for the sheltered accommodation (two) and one space per unit for the flats (20). Table 4.1 states "*10 combined total*" for both the sheltered accommodation and the flats and this is unclear. A minimum of 22 cycle spaces are required. Cycle parking needs to be covered, and ideally would be located within the buildings.

Three spaces are proposed to be provided with active electric vehicle charging facilities. This does not meet the Building Regulations which for new residential units requires one active charger per space.

The site is predicted to have a net increase of minus one vehicle in the AM peak and seven vehicles in the PM peak. This is acceptable.

Tracking for a large car has been provided for the end bay and is acceptable.

A General Arrangement Plan (A-21251-P-03-204 P7) has been provided in Appendix C of the Transport Statement. The plan should be updated to include dimensions of the access, footways and parking bays, and existing and proposed visibility splays. The footway provision into the site at the access points is unclear, please update the plan with clear footway definitions. The update should also show the refuse stores & collection points, and the cycle stores as their locations are unclear. There is concern that a vehicle parked in the western parking bay adjacent to West Kent Avenue could reverse back into the crossing point and the layout therefore needs further consideration.

The existing crossover on West Kent Avenue is to be closed and the full height kerb reinstated. This is welcomed.

Conclusion

I wish to place a holding objection on the application until the above issues have been resolved.

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.