



National Highways Planning Response (NHPR 21-09) Formal Recommendation to an Application for Planning Permission

From: Regional Director
Operations Directorate
South East Region
National Highways
planningse@highwaysengland.co.uk

To: Gravesham Borough Council (FAO Case Officer: Mrs Amanda Grout)
planning.reps@gravesham.gov.uk

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

Council's Reference: 20220839

Location: Cobham Lodge, Valley Drive, Gravesend, Kent DA12 5UE

Proposal:

Conversion of existing house to 10no. flats including side and rear extension and loft conversion.

Conversion of rear annex building to 2no. dwelling houses including proposed new dormers.

Construction of new apartment building to form 11no. new apartments.

Construction of 8no. semidetached and 1no. detached houses and associated development.

National Highways Ref: 96093 #17826

Referring to the consultation on a planning application dated 12 September 2022 referenced above, in the vicinity of the A2 and M2 and the proposed Lower Thames Crossing forming 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 a condition should be attached to any planning permission that may be granted (see Annex A – National Highways recommended Planning Conditions & reasons);

~~e) 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 (*prepared by the Area 4 Spatial Planning Team*) and is made available to the Department for Transport as per the terms of our Licence.

Should the Local Planning Authority not propose 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@highwaysengland.co.uk.

Signature: 	Date: 3 October 2022
Name: Kevin Bown Position: Spatial Planning Manager Highways England, Bridge House, 1 Walnut Tree Close, Guildford, GU1 4LZ	

Annex A **National Highway's 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.

² As announced on 19 August 2021 Highways England became National Highways; although our roles and responsibilities remain largely unchanged and our branding will transition over a period of time.

Recommendation:

That a condition 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, reliable and efficient operation of the SRN, in this case, particularly the proposed route of the Lower Thames Crossing in the vicinity of Gravesend.

We have assessed the application from two perspectives

- a) Impact of traffic attracted to or generated by the proposed development once the site is developed. Given the location and small-scale nature of the potential development we have no objection from this perspective.
- b) Impact on the construction and/or operation and maintenance of Lower Thames Crossing. The site is located close to the current red-line boundary for the Lower Thames Crossing. We have concerns regarding the potential for impacts on the SRN during the construction phase of the proposed development, particularly if it coincides with Lower Thames Crossing related works. Therefore, we recommend that a Construction Management Plan condition (see below) be attached to any permission granted

It should be noted that it is assumed that the applicant is fully aware of the proximity of the Lower Thames Crossing route to the site as will be any future investor, developer, purchaser or occupant and that any party will make any decision in full knowledge of the potential consequences of that proximity.

On this basis, we are content that, subject to the imposition of the recommended condition (see below), the above proposed development will not unacceptably impact on the safety, reliability and/or operational efficiency of the current and proposed SRN (the tests set out in DfT C2/13 and MHCLG NPPF2021).

Consequently, we have No Objection to application 20211170 subject to the imposition of the recommended condition set out below.

Recommended Condition

Pre-Commencement Condition: Construction Management Plan

No works shall commence on the site hereby permitted (including site clearance or preparation) until the details of a Construction Management Plan have been submitted to and approved in writing by the local planning authority (who shall consult with National Highways). Thereafter the construction of the development shall proceed in strict accordance with the approved Construction Management Plan unless otherwise agreed in writing by the local planning authority (who shall consult National Highways).

Reason: To ensure that the A2 and proposed Lower Thames Crossing Trunk Roads form an effective part of the national system of routes for through traffic in accordance

with section 10 of the Highways Act 1980 and to satisfy the reasonable requirements of road safety.

Informative: The CMP shall include details (text, maps and drawings as appropriate) of the scale, timing and mitigation of all construction related aspects of the development. It will include, but is not limited to: site hours of operation; numbers, frequency, routing and type of vehicles visiting the site; travel plan and guided access/egress and parking arrangements for site workers, visitors and deliveries; plus sheeting of loose loads and wheel washing and other facilities to prevent dust, dirt, detritus etc from entering the public highway (and means to remove if it occurs).