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Highways and Transportation

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Tel: 03000 418181

Date: 21 October 2025

Our Ref:

Application -	GBC/20250889
Location -	Buckland Farm, Chalk Road, Higham, Rochester Kent
Proposal -	Outline planning application for the demolition of existing buildings and erection up to 40 residential dwellings, public open space and associated works. Approval is sought for the principal means of vehicular access from Chalk Road and all other matters are reserved.

Application

Thank you for your consultation relating to a planning application for a development on Land at Buckland Farm, Chalk Road, Higham. This proposal was the subject of KCC Highways pre-application advice on 19th June 2025 where a number of concerns were discussed and generally the Transport Statement submitted in support of the application on 2nd September 2025 addresses those concerns.

The Site

The existing site is located on Chalk Road, north of Taylor's Lane and west of the railway line.

Proposal

The proposal is for Outline Planning consent with all matters reserved except for access, for up to 40 residential dwellings.

Policy

The site is not allocated in the Gravesham Borough Council (GBC) Core Strategy which is the current adopted policy.

Within the Transport Statement (TS) the applicant has reviewed a number of paragraphs and policies within the National Planning Policy Framework (NPPF), Kent County Council's Local Transport Plan 5 (LTP5) and Gravesham Borough Council's Core Strategy. However, the following paragraphs and policies should also be considered:

NPPF: paragraph 148 "When drawing up or reviewing Green Belt boundaries, the need to promote sustainable patterns of development should determine whether a site's location is appropriate with particular reference to paragraphs 110 and 115 of this Framework. Strategic policy-making authorities should consider the consequences for sustainable development of channelling development towards urban areas inside the Green Belt boundary, towards towns and villages inset within the Green Belt or towards locations beyond the outer Green Belt boundary." and "155c The development would be in a sustainable location, with particular reference to paragraphs 110 and 115 of this Framework;".

KCC's LTP5: The applicant's review does not refer to the document's aims to reduce car dependency and increase active travel and public transport. Rural developments that rely heavily on car travel conflict with this aim.

GBC's Core Strategy Paragraph 2.6.4 states "In view of these challenges and opportunities, there will be a need to ensure that: new development is mixed use, is located in areas with best access to services and facilities which minimise the need to travel, particularly by car and minimises impacts on the road network; and support is given to alternatives to car based transport such as improved bus, train, cycling, walking..." Proposals in remote areas lacking infrastructure conflict with this statement.

Whilst the above policy statements are applicable, it is considered that the location of the site close to the railway station means that any objection on highway grounds due to the unsustainable location may not be appropriate and it is up to the LPA to consider that element.

Access by Sustainable Modes

Routes used by pedestrians and cyclists should be direct, well connected, well lit, attractive and overlooked. There is concern that whilst this may be achievable on the site itself, the routes to / from local facilities do not provide sufficient infrastructure to support the development. However, the proximity of the railway station with regular services in both directions and footway provision reduces any concerns. The LPA should decide if there are other sustainability concerns that need to be considered in their decision making.

All mode access is to be taken from a priority junction with Chalk Road, with a 2m footway connecting to the existing highway network. The footway is welcomed. Cyclists will be required to travel on carriageway. Not ideal but low traffic flows along here and extending speed bumps to help slow traffic which is currently speeding.

Table 7 of the TS sets out the local facilities within walking distance of the site. No facilities are located within 1km of the site and the majority are 1.8km from the site, around a 20-minute walk. This is further than the 800m round trip stated within the KCC Transport Assessment and Travel Plan Guidance Document and it is questioned whether residents would walk this far. No secondary schools (including Grammar schools), or supermarkets are referred to. There are no employment areas within 2.4km of the site and whilst the medical practice is located within 1.8km, it is understood that this facility is closing. Cycling is unlikely to be an attractive option to some facilities due to the gradient of School Lane. It is noted that the site is 500m from the National Cycle Network.

Paragraph 5.32 states "The nearest bus stops are situated c.480m to the south of the site on School Lane, adjacent Higham railway station". Whilst this is above the recommended distance set out by CIHT and Active Travel England, it is considered a reasonable distance in this location. Table 9 shows that the 417 provides three services per day between Gravesend and Cliffe Monday – Saturday and no Sunday services. There are no buses during the AM peak (0800-0900) (although there is one southbound service at 07:35), and one service (southbound) during the PM peak (1700-1800). The bus service is therefore not high frequency and therefore unlikely to be attractive to new residents. At paragraph 6.53 the Transport Statement states "Whilst the low level of bus service frequency is acknowledged, given the scale of the proposals, it is unlikely that improved long-term provision could be provided and therefore measures to encourage residents to use the railway station is a key focus".

The site is within a reasonable walking distance of Highway Station which provides a good level of services to London, Gravesend, Luton and Gillingham, providing opportunities for both commuting and leisure purposes.

A walking and cycling audit of two routes within the local area has been undertaken based on the LTN 1/20 methodology: Route 1 – The Site to Higham Station, Route 2 - School Lane between Higham Station and Villa Road. The results are presented in Table 8 of the TS and show that some improvements are required

In order to improve the walking and cycling environment for new residents, the applicant is proposing to provide the following (some of which can be seen on plans T25510.003, 004 and 005):

- Vegetation clearance on existing footways along Chalk Road towards the railway station to increase useable width.
- Resurfacing of Chalk Road between the site and the railway station to make walking a more appealing mode of travel, whilst also removing potential trip hazards for pedestrians.
- Vegetation clearance of existing footways along School Lane towards local facilities within Higham, to useable width.
- Dropped kerbs and tactile paving at the Chalk Road / Chequers Street junction (although it is noted that the exact placement of the crossing needs further consideration for visibility reasons and to shorten the distance pedestrians have to cross) and the School Lane / Steadman Close junction (including a short section of footway for users who cannot use the steps). This should be the subject of consultation with KCC Highways, possibly at the time that reserved matters are considered or a condition added to this current application for details to be submitted and works undertaken prior to first occupation. This will require the removal of some roadside vegetation.
- An improved crossing facility on Steadman Close to cater for wheelchair users and pedestrians with pushchairs
- Formalisation of layby parking on School Lane south of Knowle Country House Wedding Venue to increase the working width of the footway due to the observed presence of vehicles parking partially or entirely on the western footway and in the informal layby opposite.
- Contributions towards cycle parking capacity and infrastructure improvements at Higham Station to make cycling a more attractive method of travel to the station. Please note that this is also a requirement for the adjacent Nuralite consented application and may need to be arranged such that the first development to proceed to occupation makes such a contribution / facility.
- Signage along Chalk Road to the south of the site to help guide residents to the railway station and local bus stops.
- Cycle parking facilities outside the shops at the School Lane / Hermitage Road junction.

Access by Car

Access to the site is via an existing farm track off Chalk Road. Chalk Road is subject to single yellow lane markings and some on street parking occurs.

A crash data assessment has been undertaken and KCC agree with the conclusions.

Access to the site is proposed to be via a priority junction with Chalk Road and can be seen on plan T25510.001 Revision D. The access will be shared by both the new residents and users of the farm. The access is located across from two existing driveways, which is not ideal. However, the existing farm access, which is to be incorporated into the new access, operates under a similar situation. Any highway infrastructure that may be affected by a new access including highway signs and utility poles which may block visibility / need to be relocated.

As stated in the Road Safety Audit, visibility for pedestrians from the end of the extended footway to the west of the site needs to be considered, or the footway should be omitted and possibly dedicated as highway verge to cater for future footway improvements.

A Road Safety Audit has been undertaken for the site access (only) and five issues were raised. The Designer's Response has responded to each in turn, rectifying all but one issue, relating to the swept paths. Swept paths have been undertaken for an 11.2m refuse vehicle and a 15m tractor and trailer. The tracking shows the vehicles require use of both side of the access and some of the main carriageway to turn in/out of the site. The audit states "Measures to mitigate large vehicles overrunning the opposing carriageway/footway when negotiating the turning manoeuvres at the site access should be provided. In addition, ensure that inter-visibility splays between vehicles entering and exiting the development are provided". The Designer's Response states "Disagree – The proposed site access road is 6.75m wide and Chalk Road within the vicinity of the site is c.6.0m wide. Further widening is likely to encourage greater vehicle speeds associated with turning manoeuvres at the site access junction. It should be reiterated that refuse vehicles will only be serving the site once per week, and farm vehicles will only be using the access 3 or 4 times per month on average. Both vehicles are likely to slow down to complete the manoeuvre within the carriageway. Forward visibility splays have been provided to demonstrate that a car can stop and wait for these vehicles to complete the manoeuvre and pass along the carriageway before the car proceeds". A Condition to require the necessary visibility splays (shown in red on the drawing) should be added to any consent granted.

Data obtained through an Automatic traffic counter (ATC) showed that traffic is travelling in excess of the 30mph speed limit, with 85th percentile speeds of 33mph eastbound and 38mph westbound. The visibility splays have been calculated based on these speeds and are shown on plan T25510.002 Revision E to be 50m to the east and 95m to the west

The ATC data has not been provided for review and is required to be submitted for completeness.

In order to try to reduce speeds on Chalk Road within the vicinity of the site, the applicant proposes to:

- Extend provision of the existing speed bumps and accompanying signage, to within the vicinity of the proposed access;
- Provide interactive speed signs on approach to the site access. Full details should be submitted under reserved matters and discussions would need to be undertaken with the LHA for a commuted sum to cover future maintenance costs.
- In order to prevent any further on street parking on Chalk Road the applicant proposes to implement double yellow lines via a Traffic Regulation Order. This would need to be funded by the applicant. Consultation with the GBC Parking Manager prior to implementation as to its benefits.

During pre-app KCC and the applicant discussed the presence of existing on street parking on Chalk Road, which may be displaced by the proposals. A parking beat survey has been undertaken and Table 4 of the TS shows that between the hours of 00:30 and 05:30 over a two-day period, there was a peak demand of 11 vehicles on street, with space for approximately eight further vehicles.

Parking is a reserved matter. However, in addition to new resident parking, the proposal includes five spaces on site, adjacent to Chalk Road, to accommodate the existing on street parking. The spaces will be subject to permits and allocated to existing residents. This would be

acceptable and the spaces should not form part of the adopted highway otherwise any permits issued would be invalid.

Parking for the new residents will be based on the relevant standards at the time (SPG4 or KCC's current standards if they have been adopted by Gravesham Borough Council). Cycle parking will be provided on a one per bedroom basis, and electric vehicle charging infrastructure will be based on KCC's standards. This is acceptable.

A Travel Information Pack will be provided to new residents and an example is provided in Appendix J. This is welcomed.

Trip Generation

The site is anticipated to generate approximately 21 two-way trips in the AM and 20 two-way trips in the PM. Traffic is likely to be distributed 70% / 30% along Chalk Road. This level of traffic generation and distribution is unlikely to have a significant impact on the highway network and therefore no off-site junction capacity assessments are required. The site access has been modelled for a future scenario of 2030 and the results show the access is proposed to operate well within capacity during both peak periods.

Conclusion

No objection is raised to this outline application on highway grounds provided the following Conditions are applied to any consent granted:

1. Provision and maintenance of the visibility splays shown on the submitted plans (T25510.001 Revision D) with no obstructions over 1.05 metres above carriageway level within the splays, or 0.6 metres where a footway crosses the access, prior to the use of the site commencing.
2. The development/new school shall not be brought into use until a Travel Plan, to reduce dependency on the private car, has been submitted to and approved in writing by the Local Planning Authority. The Travel Plan shall include objectives and modal-split targets, a programme of implementation and provision for monitoring, review and improvement. Thereafter, the Travel Plan shall be put into action and adhered to throughout the life of the development, or that of the Travel Plan itself, whichever is the shorter.
3. Prior to first occupation the highway improvements detailed in the submitted Transport Statement are completed to the satisfaction of the LPA in conjunction with the LHA under suitable legal agreement(s).
4. Provision and permanent retention of secure, covered cycle parking facilities prior to the use of the site commencing in accordance with details to be submitted to and approved by the Local Planning Authority.
5. Provision and permanent retention of the vehicle parking spaces in accordance with the relevant KCC Parking Standards prior to the use of the site commencing.
6. A financial contribution or works in order to improve / increase the cycle parking facilities at Higham railway station in agreement with the LPA if not already previously undertaken by others prior to first occupation of the development.

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.