



Gravesham Borough Council

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Windmill Street
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Kent
DA12 1AU

Highways and Transportation

Kroner House
Eurogate Business Park
Ashford
TN24 8XU

Tel: 03000 418181

Date: 20 February 2025

Our Ref:

Application - GB/20250013

Location - Land To The North And South Of Station Road, Southfleet, Gravesend, Kent DA11 8HX

Proposal - Proposed construction, operation and maintenance of a Battery Energy Storage System (BESS) with associated infrastructure (including batteries in storage containers, a substation and inverters) and works including highway access, landscaping and biodiversity enhancements.

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

This application is supported by a Transport Statement dated December 2024 which appears to be robust in its approach to the highway issues. It is accepted that once the facility is operational then traffic generation would be very low and in small vehicles. It is therefore only the construction stage that needs to be assessed for its impact on the local highway network.

The predicted number of HGV movements is relatively low with an average of 3 HGV deliveries per day and a maximum of 10 - 15 per day. Access from the site(s) is directly onto Station Road which is a suitable road for this small number of traffic movements. The site is close to the junction with the A2 strategic route. Construction workers are expected to average 20 workers per day which would not result in significant travel movements.

The Transport Statement includes an outline Construction Traffic Management Plan (CTMP) and a Condition should be included to any consent granted for the submission and approval of a detailed CTMP prior to any works commencing.

I therefore raise no objection on highway grounds to this application provided the following Conditions are applied to any planning consent granted:

1 Submission and approval by the LPA of a detailed Construction Traffic Management Plan prior to any works, including any demolition works, commencing.

2 Provision and maintenance of the visibility splays shown on the submitted plans (2305-048-SK01B and 2305-048-SK02A included in Transport Statement) 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.

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.