



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: 17 October 2024

Our Ref:

Application - GB/20240544

Location - Land At Cobham House Vineyard, Gold Street, Cobham, Gravesend Kent

Proposal - Application to determine if prior approval is required for a proposed; Erection of a winery building and hardstanding for Agricultural or Forestry use of the Town and Country Planning (General Permitted Development) (England) Order 2015 (as amended) - Schedule 2, Part 6

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

Firstly I would like to point out than under our protocol arrangements Kent Highways would not normally respond to consultation requests for minor proposals on unclassified road such as this. However, I will provide you with a few informal comments in view of the major response you have had to this application.

Secondly, this is a Prior Approval application submitted under Schedule 2, Part 6 of the GPDO which I understand only considers the siting, design and external appearance of the building and access and traffic generation matters are not up for consideration. Because of this, no transportation details such as means of access, vehicle numbers and types, access road issues etc. were not submitted with the application. I therefore have little information to base any highways impact on.

However, I note that the applicant has submitted a "Rebuttal Statement – Highways and Transport" produced by GTA Civils and Transport dated September 2024 which contains some brief information on which I base my comments.

The application building is to be accessed off a minor unclassified lane, Gold Street which is relatively narrow in width, and which has limited forward visibility and is subject to the national speed limit of 60mph. A traffic survey taken in September 2014 indicates that 85th %ile speeds on the lane are low with measured speeds of 23 / 21 mph in each direction. There appear to be adequate passing places along the road to enable larger vehicles to pass.

The number of vehicles using Gold Street currently is also relatively low with the survey indicating an average total of 497 two-way movements per day and peak flows of 10 vehicles

per hour eastbound and 15 – 20 vehicles per hour westbound during the peaks. These numbers are considered to be low even considering the type of road.

Taking the above measured speeds, it is expected that visibility splays of 2.4m x 30m in both directions with no obstructions over 1.05m high. These splays would be achievable since the land alongside Gold Street is under the control of the applicant although some hedge trimming may be necessary.

There are no personal injury crashes recorded on any of the local roads in the last 5 years so it is not considered that poor highway safety is currently an issue.

The likely traffic generation and distribution from the proposed development is not available in the applicant's submitted information although the GTA report has suggested that the TRICS database could provide an indication, although little relevant data is available. The traffic generation is likely to vary according to the season with September / October being the busiest time. It is not anticipated that vehicles exceeding 7.5 T are to be used.

I do have concerns regarding the unsustainable location of the site, but this is a rural activity that is proposed. If this were a full planning application I would expect to see a Travel Plan being submitted with the application with possibly a suggestion that a mini-bus shuttle is provided to transport employees to and from the nearby public transport hubs.

In conclusion, and accepting that little information is available from the applicant on transportation matters, I would not expect to raise an objection to this application if it were a full application but this is totally subject to the receipt of further information regarding traffic movements from the applicant.

I hope that this information is of assistance to you.

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.