



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

From: Nicola Bell (Regional Director)
Operations Directorate
South East Region
National Highways
planningse@nationalhighways.co.uk

To: Gravesham Borough Council (FAO Case Officer: Peter Price)
planning.reps@gravesham.gov.uk

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

Council's Reference: 20220432

Location: Former Police Station, 133 Windmill Street, Gravesend, Kent

Proposal: Demolition of existing structures on site and the erection of 75 Retirement Living apartments for older people (comprising 48 no. 1-bed and 27 no. 2-beds) including communal facilities, access, car parking and landscaping.

National Highways Ref: 94893 #16786

Referring to the consultation on a planning application dated 6 May 2022 referenced above, in the vicinity of the A2 and the M2 near Gravesend that form 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 conditions should be attached to any planning permission that may be granted (see Annex A – National Highways recommended Planning Conditions & reasons);~~
- ~~c) 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@nationalhighways.co.uk.

Signature: 	Date: 25 May 2022
Name: Kevin Bown	Position: Spatial Planning Manager
National Highways, 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:

Offer no objection:

Reasons:

We have reviewed the application, including the planning history of the site and the Transport Statement provided by the Awcock Ward Partnership. While we do not necessarily agree with the TS, for example with regards discounting against a long-ceased use, our own assessment has been sufficient to enable us to conclude that we are content that the proposed development will not generate an unacceptable level of additional traffic on the SRN in Peak Hours.

We therefore consider that the development will not materially affect the safety, reliability and / or operation of the SRN (the tests set out in DfT C2/13 para's 8 to 11 and MHCLG NPPF 2021 Paras 110-13), in this location.

On this basis we have No Objection to application 20220432.