

**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: 9 March 2023

Our Ref:

Application - GB/20221251 - SCON3

Location - Former Site Of Battle Of Britain, Coldharbour Road, Northfleet, Gravesend Kent

Proposal - Construction of a care home (within Class C2) associated parking, access, drainage, boundary treatments, landscape and other associated works.

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 proposal was the subject of pre-application discussions in July 2022 which provided a basis for the content of the submitted Transport Assessment dated 17th November 2022. As a result all of the relevant highway issues associated with this development have been included in the TA. I would make the following comments on the key issues considered:

Site History

The site was previously occupied by a public house which was subsequently demolished. Planning Consent was then granted for a development of 20 residential units which was accessed by a road off New House Lane in a similar location to that now proposed. The principle of access of New House Lane in this location is therefore already well established.

Local Highway Network

The site is well located at the junction of Coldharbour Road and New House Lane which provides easy access to the remainder of the local highway network, both for vehicles and pedestrians / cyclists although there is only one footway on the northern side of New House Lane. Informal pedestrian crossing points are available in New House Lane and a pelican crossing is available nearby to cross Coldharbour Road to access facilities on the western side. Traffic speeds in the vicinity of the proposed access have been measured at 27mph travelling away from the Coldharbour Road junction and 39mph travelling towards it. The speed limit on both roads is 30mph.

Highway Safety

An analysis of crash records for the 5 years up to July 2022. Whilst there have been 3 slight injury crashes on Coldharbour Road / New House Lane in the vicinity of the site, none of these appear to be related to highway defects but caused by driver error. No concerns are raised relating to highway safety.

Sustainability

The site is located in a relatively sustainable location with a range of services available within

an easy walking distance, including two major supermarkets. Bus stops are available both in New House Lane and Coldharbour Road providing regular bus services to a range of destinations. Gravesend railway station is easily accessible by cycle or bus.

Access

Vehicular access is via a single access road having a simple junction with New House Lane. This access road has a gradient of 1 in 10 (10%) which, while acceptable with reference to Kent Design, is at the recommended limit for access roads. The previously consented residential scheme proposed a gradient of 1 in 15 which was much preferred. In isolation, this is not a justifiable reason for refusal, if the applicant is able to relax this gradient at detail design stage it would be welcomed.

Visibility splays from the junction based on the measured speeds given above are proposed at 79m to the east and 39m to the west, both incorporating a set-back distance of 2.4m. This would be acceptable. However, the visibility to the west would be obscured by the existing embankment alongside New House Lane. The Transport Assessment (Page 18) refers to the construction of a footway on the southern side of New House Lane, together with a retaining wall, to provide the necessary visibility. But the site layout plan submitted (Ref. 3172/102/P10) and dated 23rd November 2022 and the plan included as Appendix F of the TA, does not show this footway. Clarification is required.

Pedestrian access alongside the access road includes a set of steps which is unsuitable for the mobility impaired and wheelchairs etc. Since the application is for a Care Home this is not acceptable unless an alternative is available. Again I refer to the conflict between the TA and the site layout plan which does not show any alternative. I consider it is essential that a pedestrian route is available from the Coldharbour Road side of the development round the south-eastern side of the junction to join with the footway shown on the southern side of New House Lane and the pedestrian crossing point.

Also it is proposed to provide a footway along the existing roadside verge on the south-eastern side of New House Lane to link with the existing bus stop on that side of the road.

Both of the above footways should be conditioned and would be subject to construction under a Section 278 Agreement with the Highway Authority since they are located in existing highway land.

Car Parking

It is proposed to provide 27 car parking spaces, including 2 disabled spaces, together with an additional ambulance space. This meets the requirements for a care home in Kent Parking Standards (SPG4) which are a maximum provision. It has been shown in the TA that this is in excess of the cumulative parking demand using data from the TRICS database. This is acceptable.

Secure and sheltered cycle parking for staff and visitors are proposed with 8 cycle parking spaces meeting the minimum standard in SPG4.

I would recommend that storage for mobility scooters should be included since this is an application for a care home.

Footway Reinstatement

The existing vehicle crossing to the site which previously served the public house off Colharbour Road is proposed to be reinstated. This is acceptable and should be Conditioned. The works would be carried out under a Section 278 Agreement with the Highway Authority.

Traffic Generation

The Transport Assessment demonstrates, using TRICS data, that the traffic generation from the proposed development is likely to be relatively low and would not result in any excessive congestion on the surrounding road network. It would be comparable to the previously consented trip generation.

In conclusion, provided the issues outlined above to the pedestrian access to the site to / from New House Lane are clarified and resolved satisfactorily with a step-free route, I would raise no objection on highway grounds to this application provided the following Conditions / Section 106 Obligations are applied to any consent granted:

1. Provision and maintenance of 39 metres (west) x 2.4 metres x 79 metres (east) visibility splays at the access with no obstructions over 1.05 metres above carriageway level within the splays, prior to use of the site commencing.
2. Reinstatement of the existing vehicle access onto Coldharbour Road via a Section 278 Agreement with the Local Highway Authority prior to the first occupation.
3. Construction of a 2.0m wide footway on the south-eastern side of New House Lane between the site access and the existing bus stop to the east via a Section 278 Agreement with the Local Highway Authority prior to first occupation.
4. Construction of a uncontrolled pedestrian crossing across New House Lane close to the proposed site access via a Section 278 Agreement with the Local Highway Authority prior to first occupation.
5. Provision and permanent retention of the vehicle parking spaces and/or garages shown on the submitted plans prior to the use of the site commencing.
6. A minimum of 10% (3) parking spaces shall be provided with EV charging stations together with a further 10% (3) be provided with passive provision i.e. cabling / ducting only.
7. 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.
8. Submission of a Construction Management Plan before the commencement of any development on site to include the following:
 - (a) Routing of construction and delivery vehicles to / from site
 - (b) Parking and turning areas for construction and delivery vehicles and site personnel
 - (c) Timing of deliveries
 - (d) Provision of wheel washing facilities
 - (e) Temporary traffic management / signage

Informative: It is important to note that planning 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 planning permission has been granted. For this reason, anyone considering works which may affect the public highway, including any highway-owned street furniture, 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 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 formal technical approval process for new or altered highway assets, with the aim of improving future maintainability. 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.

Should the development be approved by the Planning Authority, it is the responsibility of the applicant to ensure, before the development is commenced, that 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.

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.