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Highways and Transportation
Kroner House
Eurogate Business Park
Ashford
TN24 8XU
Tel: 03000 418181
Date: 29 April 2026
Our Ref: UP

Application -	GB/20260340
Location -	Rockley House , Wrotham Road, Culverstone, Gravesend, Kent
Proposal -	Demolition of existing stables buildings, removal of sand schools/menages and the erection of 6 dwellings associated vehicle parking, cycle storage and landscaping, with development to be served by existing access.

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

Access:

The existing vehicular access onto Wrotham Road (A227) is proposed to be retained and will continue to serve Rockley House as a shared driveway for the development. While the proposals would result in an increase in the use of the access, the applicant has demonstrated that appropriate vehicular visibility splays of 2.4 metres x 43 metres are available in both directions. These splays are based on the existing 30mph speed limit and are in line with the stopping sight distance requirements set out in Manual for Streets. While the development access lane is relatively long and varies in width from approximately 3 metres at its narrowest to around 5.5 metres, it is considered sufficiently wide to allow vehicles to pass one another safely.

There is currently no footway along the site frontage and no dropped kerb provision on the opposite side of the highway. To improve pedestrian accessibility and safety, the applicant is therefore requested to provide dropped kerbs and tactile paving at an appropriate crossing point and this should be shown on a plan with appropriate visibility splays.

In line with the KCC Transport Assessment and Travel Plan Guidance, Active Travel England advice and LTN 1/20, routes used by pedestrians and cyclists should be direct, well connected, well lit, attractive and overlooked. Footways along the A227 are often substandard and unlit and there are limited local facilities available within walking distance. No cycle facilities are provided along the A227, resulting in cyclists having to travel on the high speed (40mph) carriageway, which is also shared by HGVs.

Vehicle Parking:

A total of eight parking spaces are proposed within a car barn to serve plots three, four, five and six with each unit being allocated two parking bays. There are also three parking spaces for each four-bedroom dwelling. The proposed level of parking accords with Gravesham Borough Council's Supplementary Planning Guidance (SPG) 4. It is noted that for Plots one

and two, occupation of the two front parking bays would prevent the rear parking space from being independently accessible, however this is to be located on private land and this vehicle parking arrangement is not considered to result in any highway impact. Two visitor vehicle parking spaces have been provided to the south west of the site and benefit from 6 metres clearance in front, however residents would likely need to reverse out of the space for more than 25 metres, which is the maximum KCC Highways recommends.

Cycle Parking:

The applicant has explained that secure and sheltered cycle parking will be provided in the rear garden which can accommodate two cycle parking spaces. However, the applicant is required to alter the proposals to ensure that a minimum of one cycle space is provided per bedroom in accordance with the SGP 4 Parking Standards. The proposed cycle parking should be secure, sheltered and accessible. It is recommended that the cycle parking be relocated if residents would be required to manoeuvre bicycles through the dwelling.

Public Transport:

The closest bus stop is located approximately 120 metres north of the site. Whilst this is within reasonable walking distance of the site, the route to it is unlit and the lack of footway on the western side of the A227 means the route is indirect, with pedestrians forced to cross the A227, then cross back. The stops, (particularly the northbound stop), are not well overlooked by neighbouring properties. Table 2-1 provides an overview of available bus services operating at the 'Ridely Turning' bus stop. Whilst there are six school services, there is only one regular weekday service that stops at this stop – the 308.

Service 308 provides a limited level of provision, operating seven services per day between Sevenoaks and Gravesend from this stop. Services run between 10:04 and 18:31 on weekdays, and between 08:27 and 18:31 on Saturdays. There is no service operating during the AM peak period, and only very limited provision during the PM peak. As a result, the service does not offer a realistic commuting option or provide effective connectivity to wider public transport nodes, such as Meopham Railway Station or the Gravesend bus hub. Consequently, the majority of trips associated with the site are likely to be undertaken by private car, which conflicts with the National Planning Policy Framework. The 308 currently requires financial subsidy as it is not commercially sustainable based on existing usage and passenger fares alone. Funding is only secured until summer 2026.

Meopham Railway Station is located approximately 4.7km to the north of the site. This is not considered to be an acceptable walking distance. There is no morning peak hour bus service running between the site and the station, and no dedicated cycle route. This, along with the lack of street lighting along parts of the A227 and the presence of HGVs, mean cycling is unlikely to be an attractive option without significant infrastructure improvements.

Given that the existing public transport provision is considered inadequate to support development of any scale without significant enhancement, Kent County Council (KCC) Highways is focused on improving the bus service in terms of service frequency, hours of operation, and the introduction of a Sunday service. This requirement is now being applied as a standard measure to all sites allocated within the draft Gravesham Local Plan in this area, as well as to any non-allocated sites brought forward within the area. Accordingly, KCC Highways would expect a financial contribution of approximately £3,600 per dwelling to be secured via a S106 Agreement as part of this application, consistent with the approach taken for draft Local Plan sites, in order to collectively help secure the continued operation and enhancement of this bus service. However, it should be noted that the bus contribution cannot provide a high frequency service from day one, as uplift relies on contributions from other sites coming forward, the timing of which is unknown.

Emergency Access:

It is noted that a turning facility is provided to the south of the site boundary, as shown on the submitted site plan (Drawing 25099). I note the response from Kent Fire and Rescue Service and reiterate the importance of ensuring that the turning area is appropriately managed so that it remains available at all material times and is not used for vehicle parking, thereby maintaining unobstructed access for emergency vehicles. Vehicle tracking provided in Appendix D demonstrates that a fire tender can safely access and egress the site. This is acceptable.

Delivery and Servicing arrangements:

Delivery and servicing arrangements are set out in Appendix D. Drawing 2305059 TK02 includes vehicle tracking for a refuse vehicle measuring 10.5 metres in length; however, KCC Highways require tracking to be provided for a refuse vehicle measuring 11.3 metres, which is the maximum size of vehicles operating in Kent. At present, the turning manoeuvre into Plot 2 appears very tight. The applicant is therefore requested to revise Drawing 2305059 TK02 to demonstrate that a refuse vehicle of 11.3 metres can safely access and egress the site. Drawing 2305059 TK04 confirms that a delivery van can safely access and egress the site.

Trip Generation:

A trip generation assessment using the industry standard TRICS database (Land Use 03 – Residential: Houses Privately Owned) has been undertaken and indicates that the development would generate approximately four two way vehicle movements in the weekday AM peak hour, three in the PM peak hour, and around 38 two way movements across a typical weekday. While the assessment draws on suburban and edge of town sites, which are not fully representative of the rural location, the proposed development of six dwellings is expected to generate a very low level of traffic. Given the modest scale of the proposal, this is not considered likely to result in a material impact on the operation or capacity of the local highway network.

Conclusion:

I would like to place a holding objection on this application until the requested information has been provided and subsequently reviewed. However, please note KCC has significant concerns regarding the sustainability of the site given the limited local amenities available, deficiencies in local infrastructure including lighting, cycle routes, and accessibility features, and the limited public transport provision. Compliance with the National Planning Policy Framework is questioned.

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 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.