



Gravesham Borough Council

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Highways and Transportation

Kroner House

Eurogate Business Park
Ashford

TN24 8XU

Tel: 03000 418181

Date: 5 March 2024

Our Ref:

Application - GB/20240013

Location - Former St Josephs Convent Preparatory School , 46 Old Road East, Gravesend, Kent DA12 1NR

Proposal - Conversion of existing Victorian building into 6 flats. Demolition of existing outbuildings. Erection of a 3 storey medical centre. Erection of a building containing 7no flats. Erection of 41no houses. Associated works to include; access, public open space and landscaping

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

I apologise for the slight delay in responding to your consultation request.

The application is supported by a Transport Statement dated November 2023 which is considered mainly acceptable and is based on pre-application discussions undertaken with KCC on 18th September 2023.

However, there are a number of errors in the TS that require attention, for example, there are two Appendix Cs. Also the section on Parking - Section 4.5 is confusing.

Section 4.5.2 states that KCC Parking Standards (IGN3) require a maximum of 1 space per 1 bed dwelling, 2 spaces per 2 or 3 bed dwelling, and 3 spaces per 4 bed dwelling. This is incorrect for an "edge of centre" location which recommends a maximum of 1 space per 1, 2 or 3 bed dwellings. Section 4.5.3 then states that all properties will be provided with 1 parking space which conflicts with the previous statement in 4.5.2. The calculation in Section 4.5.4 stating that a maximum of 96 spaces should be provided is also conflicting stating that 60 spaces are being provided (54 + 4 garages + 2 visitor spaces) which, although this is somewhat correct, is most confusing. KCC Parking Standards recommends a total of 20% visitor parking (not within curtilages) which would amount to 11 spaces. Whilst the 20% figure is a maximum, it is recommended that in such a location where on-street parking is limited by layout, particularly on shared surfaces, that the full 11 visitor spaces should be provided and that these should be evenly spread across the development. The site layout should be amended accordingly.

Similarly, for the Medical Centre, the maximum parking provision in accordance with Kent Parking Standards (SPG4) is 1 space per 2 staff and 1 space per 4 consulting / treatment rooms - a total of $20 \times 4 + \text{no of staff} / 2 = 80 + \text{staff parking (number of staff not provided but needed)}$. The proposal is for 40 spaces in Section 4.5.7 which is considerably less than the maximum standard. The TS (4.5.7) states that "*This level of parking will be justified through an*

accumulation assessment to demonstrate that it can serve the expected demand." but no justification is provided and needs to be, possibly based on other similar facilities in the locality. Given the low level of residential parking on the development there are concerns that should the parking quantum for the Medical Centre be found to be inadequate, there is no space on the development site to expand at a later date. There are risks that the residential parking may overspill into the medical centre car park or vice versa resulting in further parking on existing local roads which would not be acceptable.

The other elements of the Transport Statement are found to be acceptable and generally comply with the pre-application discussions and advice.

It is therefore requested that a holding objection is placed on this application whilst a revised Transport Statement is submitted which addresses the issues raised above, particularly the parking section, and a revised layout plan is produced incorporating additional visitor parking spaces and justifiable parking spaces for the medical centre. Without these revisions, a refusal is recommended on the grounds of lack of justification for the parking provision.

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.