



Gravesham Borough Council
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Kent
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Highways and Transportation
Kroner House
Eurogate Business Park
Ashford
TN24 8XU

Tel: 03000 418181
Date: 14 September 2026
Our Ref:

Application -	GB/20250318
Location -	Garage Site Adjacent To 33, Empress Road, Gravesend, Kent
Proposal -	PROPOSAL 09/09/26 - Demolition of disused garages and erection of a building of
	two storeys with accommodation within the roof,
	comprising 7 self-contained flats, with alterations to the
	existing vehicular access, parking, cycle and refuse
	storage, amenity space and landscaping.
	Erection of a new residential building comprising of 5x 1 bed flats, 4x 2 bed flats and 1x 3 bed flats contained within a terraced style block.

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 is a revised application which I previously raised a number of concerns. The size of the development has been reduced from 10 to 7 units which will result in less traffic movements from the site and a higher rate of parking provision (5 spaces for 7 units). This complies with Kent Parking Standards (2025).

There are still concerns regarding the viability of the existing garage provision which, if resurrected, would reduce pressures on the on-street parking which is very high along this residential road. My comments below are therefore based on the assumption that the garages are no longer in use and are unlikely to be redeveloped as garages in the future. It is also assumed that the size of the garages are too small to accommodate modern cars.

The site is located in a relatively sustainable location with local facilities withing reasonable walking distance and bus services along Rochester Road which stop within 80 metres of the proposed development. I therefore consider that the 5 parking spaces for 7 flats is acceptable given the location. The Parking Management Plan submitted in support of the application is acceptable and should be the subject of a condition to ensure the principles are properly applied and any increase of on-street parking due to the development is minimised. The development should be excluded from any current or future residential parking scheme.

Overall, I consider the likely traffic generation from the site is unlikely to exceed that from the existing garage use should it be redeveloped therefore I do not consider any objection relating to traffic generation in Empress Road and other local roads to be appropriate.

I therefore do not raise an objection on highway grounds to this development provided the following Conditions are applied to any consent granted:

- 1 Provision and maintenance of 25 metres x 2.4 metres x 25 metres visibility splays at the access with no obstructions over 1.05 metres above carriageway level within the splays, or 0.6 metres where a footway crosses the access, prior to use of the site commencing.
- 2 Provision and permanent retention of the vehicle parking spaces shown on the submitted plans prior to the use of the site commencing. Management of the parking places to comply with that described in the submitted Parking Management Plan dated September 2026.
- 3 Provision and permanent retention of secure, covered cycle parking facilities prior to the use of the site commencing in accordance with details in accordance with Kent Parking Standards (2025) to be submitted to and approved by the Local Planning Authority.
- 4 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, which may require supporting vehicle tracking/swept paths.
 - (c) Timing of deliveries, avoiding network and school peaks where possible.
 - (d) Provision of wheel washing facilities.
 - (e) Measures to prevent the discharge of surface water onto the highway.
 - (f) Temporary traffic management / signage.

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.