



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: 19 June 2024

Our Ref: AC4DB

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

The number of visitor spaces for the residential units has been increased from two to 11, which is 20% of the total (54) and is acceptable.

The parking demand assessment for the medical centre shows an anticipated peak demand of 33 spaces, which is based on an average of eight medical centre sites. Whilst this gives some comfort that all parking can be accommodated on site, the 40 spaces proposed are well below the maximum that could be provided (80 plus one space per two staff) and this may result in on street parking. It is therefore requested that:

- The spaces allocated for the medical centre use (other than a small proportion for staff parking) should have a maximum time restriction to prevent them from being used by the residents.
- A Car Park Management Plan is conditioned and parking demand be monitored on an annual basis for a five year period, in line with the Travel Plan. If, through annual parking beat surveys, on street parking is considered to be associated with the medical centre, consideration should be given to the implementation of / change to on street parking controls. Any restrictions implemented would be at the Applicant's expense. At this point, Travel Plan measures should also be increased.

A pedestrian access will be created onto Coombe Road. Whilst the documents state this is also for cyclists, it is narrow and cyclists would therefore have to dismount (which is against LTN 1/20 guidance). Ideally, this access should be a minimum of 3m in width to cater for both users. A 3m access would also allow for an emergency access, restricting general traffic through the use of bollards.

Conclusion

Further to my previous comments dated 05.03.24, on balance, I confirm that I now raise no objection on behalf of the local highway authority. Should the LPA be minded to grant planning permission, the following conditions are requested.

Conditions

- One cycle parking space per bedroom for each house and one cycle parking space per flat to be provided prior to first occupation of the relevant residential unit. A total of 11 cycle parking spaces to be provided prior to first occupation of the medical centre.
- 54 vehicle parking spaces and four garages to be provided for the residential units, prior to first occupation of the associated unit. 11 unallocated visitor spaces are to be provided prior to first occupation of the residential element. 40 vehicle parking spaces (including four disabled spaces) and two motorcycle parking spaces are to be provided prior to first occupation of the medical centre.
- Electric vehicle charging to be provide in line with building regulations, with a minimum of 7KW output. Ducting and cabling to be provided for passive charging.
- A Full Travel Plan (based on the Framework) to be submitted to and approved by the LPA prior to first occupation of the medical centre.
- Provision and maintenance of the 2.4m x 43m visibility splays shown on the submitted plans with no obstructions over 1.05m above carriageway level within the splays, prior to the use of the site commencing.
- A Car Park Management Plan to be submitted to and approved by the LPA prior to first occupation of the medical centre, to include (as a minimum) the following:
 - (a) Opening hours of the medical centre and number of staff employed
 - (b) Number of parking spaces for staff, and for visitors
 - (c) Number of regular, disabled, motorcycle and cycle parking spaces
 - (d) Details of any parking restrictions on site
 - (e) Details of any parking related complaints or issues identified
 - (f) Details of annual monitoring methodology including parking beats along all internal roads, Coombe Avenue and Old Road East (between Whitehall Rd and Milton Av)
 - (g) Details of measures to be implemented should any on street parking be deemed to be associated with the medical centre including consideration of on street parking restrictions in consultation with KCC and GBC (implemented at the Applicant's expense), and increasing Travel Plan measures
 - (h) Annual reporting of the results and measures implemented.
- A maximum time restriction on the visitor parking associated with the medical centre to prevent use by residents.
- A Construction Management Plan to be submitted to and approved by the LPA prior to 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) Details of any 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.