



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: 24 March 2025

Our Ref: AC

Application - GB/20250167

Location - Milton Place Car Park, Gravesend, Kent,

Proposal - Construction of 76 dwellings and associated infrastructure.

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

Adoption

It is assumed that the site is to remain private and therefore the comments on which the main response is based, are those where the proposals will have a direct impact on the local highway network.

Access and Highway Works

Vehicular access is proposed to be provided via a priority junction with Milton Road. Emergency access is to be provided via the Milton Place car park. This is acceptable.

A 3m shared pedestrian / cycleway is proposed to be provided along the eastern side of Milton Place, allowing cyclists to travel southbound. This is welcomed. However, cyclists cannot discharge onto Milton Place at the southern end as the carriageway is still one way northbound at that point. The corner of Milton Place and Ordnance Road is not shared, it is footway only. The plan should be updated to demonstrate how southbound cyclists access Milton Road.

A dropped kerb will need to be provided at the southern end of the shared pedestrian / cycle route to allow northbound cyclists to egress the carriageway, and appropriate tactile paving introduced to the south to inform visually impaired users that they are entering a shared area. Ordnance Road does not have off carriageway cycle facilities and therefore, a dropped kerb will also be required along Ordnance Road (east of the flats) for cyclists to access and egress the carriageway. A cycle symbol should be provided on carriageway to make it clear that this is not a pedestrian uncontrolled crossing.

It is very disappointing that the applicant has not taken forward KCC's request to provide a segregated cycle route along Ordnance Road. This would create a high quality, attractive cycle network in this part of the town and connect to the existing facilities on Milton Road. Further consideration should be given to providing this facility.

A Road Safety Audit for the highway works has not been submitted with the Transport Assessment. This is likely to be required for the KCC Technical Approval stage.

It is unclear if the Ordnance Rd car park is to be resurfaced (including the footways and disabled bays at the eastern end). This is recommended.

Plan 2302-048 Rev A 'Proposed Site Access Arrangement', shows the running lane of the Ordnance Road car park to be partially covered by landscaping. It is assumed this is an error as the tracking shows vehicles over running this area. However, this should be confirmed. Please also confirm whether the width of the existing Ordnance Road car park aisle is to remain as existing, as the tracking for a car looks to be quite tight so larger vehicles would have difficulty accessing the bays.

There is currently a level difference between Milton Place and the car park. A plan is required demonstrating that the access road is compliant with the gradients set out in the Kent Design Guide.

Steps are currently provided at the south western corner of the car park, providing a pedestrian connection to Milton Place. These steps should be retained / re-provided to ensure the car park remains permeable and to prevent pedestrians creating their own desire lines across the vegetation.

Parking

The applicant proposes to provide 8 parking spaces for the independent living units and 19 spaces for the 15 residential units. Whilst this is within the standards, it is extremely low and it is unclear how these would be managed. It is strongly recommended that additional spaces are provided for the independent living units. However, as the surrounding local highway network is subject to double yellow line markings, any ad hoc parking is likely to remain on site.

The number of spaces in the Milton Place and Ordnance Road car parks are proposed to be reduced from 148 to 84 and 29 to 27 spaces, respectively. Evidence has been provided to support this provision and this proposal is acceptable.

In relation to the Ordnance Road car park and the junction mitigation proposals put forward under Application GBC/2021/0270, paragraph 1.6 of the Transport Assessment states *"As shown, the proposals require land within the site to come forward, and our scheme has subsequently been developed not to prejudice their delivery"*. Paragraph 3.17 states *"The Albion Waterside proposals will reduce the quantum of parking spaces available within the Ordnance Road Car Park due to the extent of widening proposed"*. Whilst it was agreed that the Albion Waterside junction mitigation would require land within this site, KCC do not believe the proposals included a reduction in the number of spaces in this car park, rather, the spaces would be pushed further into this land. The spaces should therefore be retained.

Traffic Generation

The site is anticipated to generate a total of 16 two way movements in the AM peak and 15 two way movements in the PM peak. This is unlikely to have a significant impact on the local highway network and is acceptable.

Conclusion

I would like to place a holding objection on the application until the above issues have been satisfactorily resolved. Should the LPA be minded to grant planning permission prior to these being resolved, I request the following Conditions are applied:

Conditions

The highway works as shown on plan 2302-048 Rev A 'Proposed Site Access Arrangement',

to be provided and available for use prior to first occupation.

Provision and maintenance of the 2.4m x 43m visibility splays shown on 2302-048 Rev A 'Proposed Site Access Arrangement', with no obstructions over 0.6m metres above carriageway level within the splays, prior to first occupation of the site.

8 vehicle parking spaces for the independent living units and 19 vehicle parking spaces for the 15 residential units are to be provided prior to occupation of the associated unit.

Four accessible parking spaces and four active electric vehicle charging points to be re-provided within the Milton Place car park, prior to first occupation.

A minimum of 84 vehicle parking spaces to be provided in the Milton Place car park and available for use at all times (in line with existing durations) of the construction and operation of the site.

A minimum of 27 vehicle parking spaces to be provided in the Ordnance Road car park and available for use at all times (in line with existing durations) of the construction and operation of the site.

Prior to first occupation of the associated use, one active electric vehicle charger to be provided for each house; 10% of the communal parking spaces to be provided with active vehicle chargers and 90% to be provided with passive chargers.

A minimum of 62 cycle parking spaces (including space for a minimum of four adapted bikes) to be provided for the retirement flats and a minimum of two cycle parking spaces per house, to be provided prior to occupation of the associated unit.

New residents must not be allowed to apply for parking permits for the car parks.

Submission and approval of a Construction Management Plan 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, 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.

Before and after construction of the development, highway condition surveys for Milton Place should be undertaken and a commitment provided to fund the repair of any damage caused by vehicles related to the development. Further information can be found here: <https://www.kent.gov.uk/roads-and-travel/highway-permits-and-licences/highways-permissions-and-technical-guidance/photographic-highway-condition-survey>.

Additional Comments

Whilst the below comments will not directly affect the highway, it is strongly recommended that they are considered in order to ensure the design is appropriate for all users.

Shared routes for pedestrians and cyclists must be a minimum of 3m in width. As the only 3m route is along Milton Place, it is unclear how cyclists route from the cycle store to Milton Place and Ordnance Road. In line with LTN 1/20, cyclists should not be made to dismount before

reaching the cycle store.

Two steps are shown to the north east of cycle store 1. A cycle ramp should be provided alongside the steps to accommodate this movement as otherwise, cyclists are likely to create their own desire path through the grass.

It is recommended that an internal door to the cycle store is provided in addition to the external door, to enhance permeability and safety.

Whilst cycle parking has been provided in line with standards, it is recommended that additional visitor parking is provided within the site.

A 10.6m refuse vehicle has been tracked to demonstrate that a refuse vehicle can access and egress the site in a forward gear. KCC usually require tracking for an 11.3m refuse vehicle as that is the largest vehicle that operates in Kent. As the access has been tracked for a 16.5m vehicle, the larger refuse vehicle will also be able to access the site from the highway. However, the larger refuse vehicle may have difficulty undertaking a three point turn within the site.

Page 102 of the Design and Access Statement shows the refuse vehicle strategy. It is questioned whether all residents of the apartment blocks are within the maximum drag distance of the bin store (30m).

As requested during pre-app, it is recommended that a Travel Information Pack is provided to each unit upon first occupation, providing information on walking, cycling and public transport. In order to encourage residents to cycle, it is recommended that an adapted bike (e.g. an adult trike) is provided in the cycle store, for residents to borrow / try out. Given the low level of parking for the independent living units, consideration should be given to providing each retirement unit with a free one years public transport ticket, to encourage them to use the bus.

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 a 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.