



## National Highways Planning Response (NHPR 22-12) Formal Recommendation to an Application for Planning Permission

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**Council's Reference:** 23/500899/OUT

**Location:** Land North of the A20 Ashford Road, Hollingbourne, Kent

**Proposal:** Outline application for the erection a building for storage and distribution (Class B8 use) with a floorspace up to 10,788sqm (Gross External Area), ancillary offices, associated car parking, HGV parking, landscaping and infrastructure (All matters reserved except for access).

**National Highways Ref:** NH/23/00255

Referring to the consultation on a planning application dated 14 March 2023 referenced above, in the vicinity of the M20 that form part of the Strategic Road Network, notice is hereby given that National Highways' formal recommendation is that we:

- ~~a) offer no objection (see reasons at Annex A);~~
- b) recommend that conditions should be attached to any planning permission that may be granted (see Annex A – National Highways recommended Planning Conditions & reasons);**
- ~~c) recommend that planning permission not be granted for a specified period (see reasons at Annex A);~~


~~d) recommend that the application be refused (see reasons at Annex A)~~

Highways Act 1980 Section 175B is not relevant to this application.<sup>1</sup>

This represents National Highways' formal recommendation and is copied to the Department for Transport as per the terms of our Licence.

Should the Local Planning Authority not propose to determine the application in accordance with this recommendation they are required to consult the Secretary of State for Transport, as set out in the [Town and Country Planning \(Development Affecting Trunk Roads\) Direction 2018](#), via [transportplanning@dft.gov.uk](mailto:transportplanning@dft.gov.uk) and may not determine the application until the consultation process is complete.

The Local Planning Authority must also copy any consultation under the 2018 Direction to [PlanningSE@nationalhighways.co.uk](mailto:PlanningSE@nationalhighways.co.uk).

|                                                                                                         |                                  |
|---------------------------------------------------------------------------------------------------------|----------------------------------|
| <b>Signature:</b><br> | <b>Date:</b> 26 June 2023        |
| <b>Name:</b> Kevin Bown                                                                                 | <b>Position:</b> Spatial Planner |
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## Annex A National Highways' assessment of the proposed development

National Highways has been appointed by the Secretary of State for Transport as a strategic highway company under the provisions of the Infrastructure Act 2015 and is the highway authority, traffic authority and street authority for the Strategic Road Network (SRN). The SRN is a critical national asset and as such we work to ensure that it operates and is managed in the public interest, both in respect of current activities and needs as well as in providing effective stewardship of its long-term operation and integrity.

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<sup>1</sup> Where relevant, further information will be provided within Annex A.

**Recommendation: that conditions should be attached to any planning permission that may be granted**

We will be concerned with proposals that have the potential to impact on the safe and efficient operation of the SRN, in this case, particularly within the vicinity of the M20J8 at Maidstone.

We acknowledge that during the operational phase, the development is not forecast to result in significant impact on the operation of the SRN. However given the basis of the technical assessments submitted by the applicant and in order to seek to minimise vehicular traffic movements, we have recommended a planning condition in relation to Travel Plan matters. As the site is adjacent to the SRN, we have recommended conditions associated with boundary issues, lighting, and drainage.

Additionally, we envisage the SRN being a likely route for construction traffic and we have therefore recommended a condition for a Construction Environmental Management Plan be attached to any planning consent granted at the site.

Accordingly, having assessed application 23/500899/OUT we are content that the proposals, if permitted, would not have an unacceptable impact on the safety, reliability, and/or operational efficiency of the Strategic Road Network in the vicinity of the site (M20) provided that the following conditions are imposed, reflecting DfT Circular 01/22 and MHCLG NPPF 2021 (Para 110-113 tests).

National Highways recommends that the following conditions are implemented within any planning permission granted:

1. **Pre-Commencement: Construction Traffic Management Plan**

**Condition:** No works shall commence on the site hereby permitted (including site clearance or preparation) until the details of a Construction Traffic Management Plan have been submitted to and approved in writing by the local planning authority (who shall consult with National Highways). Thereafter the construction of the development shall proceed in strict accordance with the approved Construction Traffic Management Plan unless otherwise agreed in writing by the local planning authority (who shall consult National Highways).

**Reason:** To ensure that the M20 motorway continues to be an effective part of the national system of routes for through traffic in accordance with section 10 of the Highways Act 1980 and to satisfy the reasonable requirements of road safety.

**Informative:** The CTMP shall include details (text, maps, and drawings as appropriate) of the scale, timing and mitigation of all construction related aspects of the development. It will include but is not limited to: site hours of operation;

numbers, frequency, routing and type of vehicles visiting the site (including measures to limit delivery journeys on the SRN during highway peak hours such as the use vehicle booking systems etc); measures to ensure that HGV loads are adequately secured, travel plan and guided access/egress and parking arrangements for site workers, visitors and deliveries; plus sheeting of loose loads and wheel washing and other facilities to prevent dust, dirt, detritus etc from entering the public highway (and means to remove if it occurs).

## 2. Lighting

**Condition:** No part of the development hereby permitted shall be occupied until a lighting framework has been submitted to and approved in writing by the local planning authority (who shall consult with National Highways). The lighting framework shall include details of the impact of lighting on driver safety on the M20 motorway. The development shall thereafter be undertaken in accordance with the approved details unless otherwise approved in writing by the local planning authority.

**Reason:** To ensure that any proposed lighting will not have an adverse impact on driver safety on the M20 motorway and that this road continues to be an effective part of the national system of routes for through traffic in accordance with section 10 of the Highways Act 1980 and to satisfy the reasonable requirements of road safety.

## 3. Travel Plan

**Condition:** No part of the development hereby permitted shall be occupied until a detailed Travel Plan, has been approved in writing by the local planning authority (who shall consult with National Highways) and implemented. The Travel Plan shall include such details as required by DfT Circular 01/2022, particularly paragraph 44.

**Reason:** To minimize traffic generated by the development and to ensure that the M20 continues to be an effective part of the national system of routes for through traffic in accordance with section 10 of the Highways Act 1980.

## 4. Boundary with M20/Other National Highways Land

**Condition:** Any planting or boundary features must be located such that they do not require any trespass or oversailing of National Highways land or assets as part of their construction/planting, maintenance or replacement.

**Reason:** To ensure that the M20 continues to be an effective part of the national system of routes for through traffic in accordance with section 10 of the Highways Act 1980, to satisfy the reasonable requirements of road safety.

#### 5. Drainage

**Condition:** The site preparation, construction, use and/or maintenance of the development hereby permitted shall be managed in order to ensure that no surface water runs off on to the highway or into any drainage system connected to the Strategic Road Network. No drainage connections from the development hereby permitted shall be made to any Strategic Road Network drainage systems.

**Reason:** To ensure that the M20 motorway continues to be an effective part of the national system of routes for through traffic in accordance with section 10 of the Highways Act 1980, to satisfy the reasonable requirements of road safety.

### **Standing advice to the local planning authority**

The Climate Change Committee's [2022 Report to Parliament](#) notes that for the UK to achieve net zero carbon status by 2050, action is needed to support a modal shift away from car travel. The NPPF supports this position, with paragraphs 73 and 105 prescribing that significant development should offer a genuine choice of transport modes, while paragraphs 104 and 110 advise that appropriate opportunities to promote walking, cycling and public transport should be taken up.

Moreover, the build clever and build efficiently criteria as set out in clause 6.1.4 of [PAS2080](#) promote the use of low carbon materials and products, innovative design solutions and construction methods to minimise resource consumption.

These considerations should be weighed alongside any relevant Local Plan policies to ensure that planning decisions are in line with the necessary transition to net zero carbon.