



National Highways Planning Response (NHPR 25-01) Formal Recommendation to an Application for Planning Permission

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To: Gravesham Borough Council (FAO Alison Webster)
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CC: transportplanning@dft.gov.uk
spatialplanning@nationalhighways.co.uk

Council's Reference: 20240856

Location: Former Tollgate Hotel, Watling Street, Gravesend, Kent

Proposal: Demolition of existing buildings to provide an EV charging hub and petrol filling station, including 24 charging bays and supporting electrical infrastructure (12 charging upstands, three substations and two network cabinets), six pump islands with canopy above, a forecourt shop/amenity building, customer parking, two air and water spaces and associated hardstanding and landscaping, accessed from the Wrotham Road/eastbound A2 roundabout junction.

National Highways Ref: NH/24/08483

Referring to the consultation on a planning application dated 23 October 2024 referenced above, in the vicinity of the A2 that forms 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.¹

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 propose not 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 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.

This response and all comments outlined herein are made in respect of planning matters only in National Highways' position as a statutory planning consultee, and does not confer any proprietary rights nor amount to the giving or refusal of consent, assent, approval, or awareness of or by National Highways in or of any other aspects or matters (including, but not limited to, the use of property belonging to National Highways). If anyone wishes for National Highways to consider any aspects which do not relate to planning submissions, they should call our contact centre on 0300 123 5000.

Signature: 

Date: 03 June 2025

Name: Nigel De Wit

Position: Assistant Spatial Planner

National Highways

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¹ Where relevant, further information will be provided within Annex A.

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.

Recommend that planning permission not be granted for a specified period: Reasons

It is recommended that the application should not be determined for a period of three months until **3 September 2025**.

This recommendation can be replaced, renewed, or reviewed during the three-month period, or at its end, dependent on progress made with regards to the outstanding matters.

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 A2.

Since the submission of our previous holding recommendation of 3 March 2025, the applicant has shared information with National Highways that has addressed many of the SRN-related matters. This information includes queue survey video files, Junction model files and updated LinSig modelling. We have also received drawings of the proposed mitigation to the A227 Wrotham Road/A2 Roundabout (westbound off-slip).

We have set out below the outstanding matters that need to be resolved (see **bold, underlined** text).

A227 Wrotham Road/A2 Roundabout (westbound off-slip): Proposed mitigation

We have received drawings from the applicant of the proposed mitigation scheme for the westbound off-slip. These drawings are being reviewed by National Highways. We are also reviewing the details of the proposed Road Safety Audit Team who will undertake the Stage 1 Road Safety Audit (RSA).

The RSA (Stage 1) of the proposed mitigation scheme for the A227 Wrotham Road/A2 Roundabout (westbound off-slip), supported by a Walking, Cycling, and Horse-riding Assessment and Review (WCHAR), needs to be completed to the satisfaction of National Highways.

Geotech

There are a few minor earthworks parallel to the A2 slip road and a larger cutting for the landscape area at the eastern end which backs onto National Highways land. The infiltration pond is likely to involve excavating next to the SRN.

There is a potential geotech risk, although based upon the submitted information this is not high. We are minded at the appropriate stage of the planning application process to recommend a condition (pre-commencement) to manage geotech risks. This would reference the Design Manual for Road and Bridges (DMRB) document CD 622: Managing geotechnical risk.

Drainage, Lighting, Signage, Boundary Treatment, and Construction Environmental Management Plan

Given the proximity of the site to the SRN (A2), we are minded at the appropriate stage in the planning application process to recommend conditions relating to drainage, lighting, signage, boundary treatment, and the need for the preparation, agreement, and adherence to a Construction Environmental Management Plan (CEMP).

Conclusion

Given the above, it is currently not possible to determine whether the application would have an unacceptable impact on the safety, reliability and/or operational efficiency of the SRN.

National Highways currently recommends that planning permission not be granted (other than a refusal if the Council so wishes) for a period of three months until 3 September 2025 to allow the applicant to resolve the outstanding matters.

This recommendation can be replaced, renewed, or reviewed during the three-month period, or at its end, dependent on progress made with regards to the outstanding matters.

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 77 and 110 prescribing that significant development should offer a genuine choice of transport modes, while paragraphs 109 and 115 advise that appropriate opportunities to promote walking, cycling and public transport should be taken up as part of a vision-led approach.

Moreover, the carbon reduction hierarchy (avoid-switch-improve) as set out in clause 4.3 of PAS2080:2023 promotes approaches and measures to minimise resource consumption and thereby reduce carbon emissions.

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.