

Tollgate Hotel Site, Wrotham Road, Gravesend, Kent, DA13 9RE

EIA Screening Report
23 September 2024
Our Ref: KRM/19-02858



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Quality Assurance

This report has been prepared within the quality system operated at Rapleys LLP according to British Standard ISO 9001:2015.

We confirm that the undersigned is an appropriately qualified and experienced Chartered Surveyor/Planner [delete as appropriate] experienced in the commercial property sector.

Created by: Kathryn McCain BA (Hons)
kathryn.mccain@rapleys.com

Signature:

Checked by: Jason Lowes BSc (Hons) DipTP MRTPI
jason.lowes@rapleys.com

Signature:

1 INTRODUCTION

1.1 Rapleys LLP has been instructed by BP Pulse (the 'Applicant') to undertake an Environmental Impact Assessment (EIA) Screening Opinion Request Report for a proposed EV charging hub and petrol filling station at the Tollgate Hotel Site, Wrotham Road, Gravesend, Kent, DA13 9RE (the site).

1.2 A full application has been submitted to Gravesham Borough Council in parallel to this request, seeking permission for:

"Full planning permission for the 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."

1.3 The site's location plan is at **Appendix 1**, with the red line illustrating the application site boundary. All land within the red and blue line is in the ownership of the applicant.

1.4 This Screening Option Report is structured as follows:

- The Legislative Context in terms of:
 - a) The requirement for EIA
 - b) The screening process
- Site Context and Location:
 - a) Site description
 - b) Environmental designations
 - c) Planning history
- The Proposed Development
- Environmental Baseline – Technical Information
- Conclusions

1.5 This report relies on and draws from the technical findings and conclusion of a suite of supporting application documents submitted with the aforementioned planning application, and further information relative to the matters reviewed in this report can be found within these documents.

2 LEGISLATIVE CONTEXT

Requirement for EIA

- 2.1 The requirement for an EIA is derived from the Town and Country Planning (Environmental Impact Assessment) Regulations 2017 ('The Regulations'). The Regulations require that prior to the grant of planning permission the likely significant effects of a project on the environment should be assessed.
- 2.2 Regulation 6(1) identifies that a person minded to undertake development may request the relevant local authority to adopt a screening opinion.

EIA Screening Process

- 2.3 The process of 'screening' for the need to undertake an EIA is predicated on 3 key steps, namely:
- (i) Establish whether the development is Schedule 1 Development, i.e. does it meet the descriptions of development listed in Schedule 1 of the Regulations. If so, an EIA is always required,
 - (ii) Establish whether the development is Schedule 2 Development i.e. does it meet the descriptions of development listed in Schedule 2; does it meet or exceed the thresholds in Schedule 2 or is it located in a 'sensitive area' as defined in Regulation 2(1), and,
 - (iii) If the development can be defined as Schedule 2 Development, consider whether it is likely that the development will have significant effects on the environment (through consideration of factors identified within Schedule 3 of the EIA Regulations). If so, an EIA should be requested. If not, consider whether any further environmental information is necessary to supplement the planning application.
- 2.4 The proposed development does not meet any of the descriptions of development listed in Schedule 1 of the Regulations, and therefore it is not Schedule 1 development.
- 2.5 To determine whether the proposed development is Schedule 2 Development, an assessment needs to be made as to whether:
- (i) The proposals meet the descriptions of development in Schedule 2; and
 - (ii) The proposals meet or exceed the thresholds in Schedule 2 and/or whether the development is located in a 'sensitive area' as defined in Regulation 2(1).
- 2.6 The proposed development is considered to fall under category 10(b) urban development projects where development thresholds for screening purposes includes development of more than 1ha that is not dwellinghouse development. However, the site is not in a sensitive area, as defined in PPG (Paragraph: 032 Reference ID: 4-032-20170728). Although category 10 (p) confirms that motorway service areas over 0.5ha are also Schedule 2 development, this proposal is not a motorway service area and as such does not fall into this category, as it does meet all the Highways England requirements for such development (not least, it will not provide two hours of free parking).
- 2.7 As the site is Schedule 2 development that exceeds the relevant threshold set by the criteria, the proposal is submitted for screening by the local authority to consider whether it is likely to have significant effects on the environment.
- 2.8 However, the size of the development on its own should not be the key determining factor in deciding whether or not EIA is necessary. Moreover, indicative thresholds given in the EIA Regulations and Planning Practice Guidance (PPG) (ie, the inclusion of more than 150 dwellings) do not in any way compel or otherwise imply that the Council must adopt a positive screening opinion. The PPG advises that EIA is unlikely to be required unless the new development is on a significantly greater scale than the previous use or the type of impact are of markedly different nature. Rather than the size of any particular development, the PPG also advises that the key issues to consider are "*potential increases in traffic, emissions and noise*" which are discussed later in this Opinion appraisal.
- 2.9 The proposed development does not trigger or meet any of the above PPG criteria – further detail and reasoning behind this is identified further through the screening process and technical analysis that has been undertaken to support this assessment.
- 2.10 Regulation 6(2) requires the submission of a site plan, a description of the characteristics of the proposed development and its location, the likely significant effects on the environment, and any potential mitigation.

- 2.11 The screening opinion must take into account the criteria in Schedule 3 of the Regulations and any other environmental assessments that may be available. The over-riding determinant as to whether a development is EIA development or not is whether it is likely to have SIGNIFICANT effects on the environment. The three key criteria that should be considered are –
- (i) Characteristics of the development – size and scale (and in combination with other development), use of natural resources/environmental baseline, waste production, pollution and risk of accidents,
 - (ii) Location of the development and ‘sensitivity of the site’, and
 - (iii) Characteristics of the potential impact (magnitude, extent, probability, reversibility, duration, frequency).

3 SITE CONTEXT AND LOCATION

Description

The application site is located to the north of the eastbound entry slip road to the A2. The site accommodates buildings associated with the former Tollgate Hotel, an area of approximately 1 hectare, including:

- A part two storey, part single storey pitched roof, mock-Tudor building, to the north west (which comprised a former public house, before the site was converted to a hotel and restaurant);
- A large two storey L shape building framing the northern and eastern boundaries (comprising hotel rooms);
- Two centrally located single storey buildings (including a function room), and
- Hardstanding to accommodate car parking, and areas of hard and soft landscaping.

3.1 A former hotel room building to the south of the site was demolished to enable the construction of the new slip road to the A2. The remaining buildings, on site, particularly the two storey L shaped building, are prominent particularly when viewed from the west and the A2.

3.2 The property was previously in use as a hotel and restaurant, with conferencing and event facilities. The site has lain vacant since 2006, although the site was in use on a temporary basis during the construction of the realigned A2 trunk road in 2009. The site is cleared of shrubbery/vegetation, and the site has been made secure by robust boundary treatment and CCTV to discourage vandalism and antisocial behaviour.

3.3 The site is accessed off the adjacent roundabout junction of Wrotham Road and the A2, using an existing, dedicated turning from the roundabout.

Surroundings

3.4 The southern boundary of the site is shared with the eastbound entry slip road of the A2 dual carriageway.

3.5 The western boundary follows a generally curved line which is derived from the former road alignment and access arrangements which existed before the realignment of the A2.

3.6 To the east of the site lies a field, with the A2 eastbound slip road abutting the site to the south, which leads from the northern roundabout of the junction of the A2 with the A227 Wrotham Road.

3.7 The former A2 (Roman Road) abuts the site to the north and north east; the road is no longer a through road as it reaches a dead-end where the old road surface has largely been removed and replaced by a footpath and cycleway. Further to the north-east is the Cyclopark cycling and outdoor activity facility.

3.8 Also beyond the former A2, directly to the north of the site and served by a dead-end road, is a petrol filling station (Shell branded, but in independent ownership), comprising:

- A six pump island forecourt with a high-level canopy allowing for HGV fuelling
- An unusually large (for a petrol filling station) forecourt shop with a number of hot food counters (including Favourite Fried Chicken and Subway), and
- Jet-wash and parking facilities.

3.9 The adjacent petrol filling station was previously located alongside the A2, but is now located to the north of A2 on Wrotham Road, adjacent to its junction with The Tollgate, as a result of the A2 realignment.

3.10 Around the petrol filling station are a number of residential dwellings, the nearest of which is approximately 60m from the site.

Environmental Designations

3.11 In terms of the matters identified by the Regulations as to what might constitute a “sensitive area”:

- The Site is not within or adjoining a Conservation Area.
- There are no listed buildings within or immediately adjacent to the Site.
- There are no identified or known heritage assets or Scheduled Ancient Monuments within or adjacent to the Site.
- There are no Tree Preservation Orders within or adjacent to the Site.

- The Site is not located within or adjacent to an AONB or National Park. It is, however, within the Green Belt, the Thames Estuary and Marshes Ramsar Buffer and Gravesham Fringe Landscaper Character Area.
- The Site is also adjacent to a Biodiversity Opportunity Area
- The Site is not within or adjacent to an SSSI, European designation or LNR or SINC.
- The Site is within Flood Zone 1, and within a Groundwater Source Protection Zone 2.
- There are no designated Public Rights of Way (PROW), or bridleways within the Site.
- The Site is within an Area of Archaeological Potential, and an Air Quality Management Area.

3.12 As such, the site is not within a sensitive area as described by the Regulations.

4 PLANNING HISTORY

- 4.1 A planning history schedule, based on information available on the local authority's public online records, is contained at **Appendix 1**.
- 4.2 The schedule confirms that the site has an extensive planning history, with most planning applications relating to the site's use as a hotel. These applications (and resulting planning permissions) confirm that the local authority supported the organic growth of the former hotel, thereby confirming its use as a developed site within the Green Belt.
- 4.3 The schedule also details the planning permission which granted the use of the site for temporary site offices to support the A2 works in January 2007 (ref: 20061063), and the application form further confirms that this permission was intended to be temporary, and not a permanent new land use.
- 4.4 More recently, two planning applications were submitted relative to the site. These applications were submitted by BP, albeit Rapleys did not act as planning consultant at that stage. Although both applications were ultimately withdrawn, the background to both applications is somewhat protracted.

5 THE PROPOSED DEVELOPMENT

5.1 The development subject to this screening opinion is:

“Full planning permission for the 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.”

5.2 More specifically, the proposed development consists of:

- 24 Electric Vehicle (EV) charging bays, including two accessible EV charging bays, each sharing an EV charging upstand.
- The charging bays will surround a centrally placed 450sqm sales/amenity building which includes facilities and areas for customers to relax while they wait for their vehicle to recharge. More specifically, the sales/amenity building comprises:
 - A sales area for goods intended to meet the needs of the motorist using the site to recharge/refuel, of the same type and scale (and selling the same range of goods) as would be found in a modern petrol filling station – as with many BP branded petrol filling stations, the retail element will be M&S branded;
 - A “Wild Bean Café” branded café area, again similar in size and scope to other fuelling facilities (albeit with a slightly larger seating area to recognise longer dwell times associated with EV charging);
 - Customer toilets, and
 - Supporting “back of house” facilities, and a screened compound on the southern side of the building.
 - A green/sedum roof to secure further biodiversity improvements whilst helping the proposed building to blend in with the surroundings.
- A six island petrol filling station forecourt to the east of the sales building, in a domino six layout above two underground fuel storage tanks, covered by a stand-alone bespoke canopy, incorporating PV panels, which has been specifically designed for the site in the interests of ensuring that it is:
 - As low as possible, in the context of minimising development on the site in visual terms, and
 - As “thin” as possible, to create a light-weight solution, again to minimise visual impact.
- With regard to the wider proposal:
 - 37 customer parking spaces to the west of the sales building, which will primarily offer a waiting area for EV charging, as well as provide additional parking for customers after refuelling (for rest, or to spend more time using the on-site services), in a manner akin to existing roadside services/petrol filling stations.
 - Four accessible bays and two accessible EV charging bays are located adjacent the sales building;
 - One parcel collection locker and one recycling deposit return scheme both with associated parking bay located to the west of the sales building;
 - Four staff parking spaces and two air/water bays to the south of the petrol forecourt area;
 - Cycle parking to the north of the sales/amenity building;
 - Four electricity substations, and three network cabinets, to the north-east of the sales/amenity building.
 - Internal vehicular circulation hardstanding, utilising an upgraded access in approximately the same location as the existing vehicular crossover onto the adjacent roundabout.
 - Internal pedestrian paths, as well as pedestrian/cycle accesses to the south-west of the site and the northern part of the site to feed into existing routes.
 - Substantial landscaping and tree planting around the perimeter of the site and within in it, to screen and create a soft interface between the development and the surrounding area.

- 5.3 The petrol filling station element has been included within the proposals as, in current conditions, with EV charging still emerging, it is essential to provide services to all road users during this transition period. However, the proposal has been designed with the intention that this element will, in effect, be temporary whilst the transition from fossil fuels to EV charging takes place. Once appropriate market conditions establish themselves, the petrol filling station element will be removed, and replaced with additional EV charging or (depending on emerging technology) another form of low-carbon refuelling, such as hydrogen.

6 ENVIRONEMNTAL BASELINE – TECHNICAL SUMMARY

6.1 Baseline conditions for the key environmental topics are provided below, summarising as series of technical reports and assessments undertaken by a team of consultants which have informed the development proposals. They have been submitted as part of the planning application submitted in parallel to this request. Where necessary and appropriate, the proposals incorporate mitigation.

6.2 The consultant team and technical reports comprise:

- Rapleys LLP - Planning
- MBH Architect – Scheme Architect
- Graham + Sibbald LLP – Hotel and EV Needs Assessments
- Eco Tech – Ecology
- SLR – Bat Surveys
- Owen Allpress - Trees
- Wardell Armstrong – Air Quality Assessment
- Weetwood – Flood Risk and Drainage
- Markides - Transport
- Subadra - Fuel Storage Feasibility, Contamination and Infiltration
- Huskinson Brown – Landscape design, and Landscape and Visual Impact Assessment
- GW Lighting Consultancy – External Lighting
- EDP – Heritage and Archaeology
- Sharps Redmore - Noise

6.3 The technical reports do not identify any overriding environmental sensitivities that could not otherwise be accounted for through mitigation and careful design and management of the development.

Ecology/Flora/Fauna

Baseline/Existing Conditions

6.4 The site is primarily covered by developed land/sealed surfaces and buildings (0.8ha). As identified in the Ecology Impact Assessment the following habitats are also contained within the site:

- Other neutral grassland (0.08ha)
- Bramble scrub (0.04ha)
- Rhododendron scrub (0.01ha)
- Mixed scrub (0.02ha)
- Ruderal/ephemeral (0.23ha)

6.5 There are also existing trees on and a small block of woodland on site. No rare or unusual plant species or communities were identified.

6.6 The Assessment found all existing habitats on site to be of negligible value for vascular plant species, invertebrates, great crested newts, reptiles, bats, badgers and birds. The site may have some value for hedgehogs. It is noted that, if hedgehogs are present on site, their habitat would only be lost temporarily during the construction phase of the development, and the impact is therefore considered minor adverse, and would be negated by the provision of additional landscaping proposed as part of the development. Additional measures, including provision of 'hedgehog houses', and fences with an appropriate size gap to allow hedgehogs to navigate through the site, would be provided.

6.7 A Bat Survey Report has been prepared by SLR Consulting and submitted in support of this planning application. This Bat Survey Report identifies the results from a Preliminary Roost Assessment (PRA) and a suite of presence/absence bat surveys. The Surveys found no evidence of bats emerging from or re-entering any buildings. The overall value of the site for local bat populations is negligible.

Impacts

6.8 There are no nearby Statutory sites that could potentially be impacted by the proposed construction of the commercial area and the Local Wildlife Sites are sufficiently far to avoid any impact from the

small scale of the development being proposed being separated from the site by major roads and of botanical interest.

- 6.9 The site contains no significant ecological features and development of the site area surveyed could be carried out in a manner that does not have any significant impact on local biodiversity. Rather, the proposal would improve the biodiversity and ecological value of the site by providing new habitats and trees, including a Biodiversity Net Gain of 14.81% over the pre-development value. This increase in biodiversity above the 10% gain required by planning arises principally from the replacement of previously developed land with a development that includes features such as ponds, swales and native tree planting.

Mitigations

- 6.10 The mitigation measures proposed include:

- **Nesting Birds:** Measures to avoid disturbance to any nests or nesting activity will need to be considered prior to any vegetation clearance. Enhancement is provided via proposed habitat creation and proposed placement of six open fronted, small and large diameter hole bird boxes (some of these can be integrated into buildings)
- **Bats:** no bats were seen to emerge from, or return to roost in any of the buildings, indicating that these buildings were not being used by roosting bats. Pre-demolition surveys will be undertaken prior to the buildings being demolished as/when required by the relevant trigger. Enhancement is provided via proposed habitat creation and proposed bat boxes to be placed on the trees as far away from the A2 as possible to limit their exposure to the traffic noise and light spill.
- **Badgers:** measures to protect these species from harm during construction activities will be required.
- **Hedgehog:** Modern fencing down to ground level prevents hedgehogs from moving between foraging areas. Hence, small, 13x13cm gaps at ground level in fencing is proposed. A 'hedgehog house' suitable for both breeding and hibernation is proposed.

- 6.11 Consequently, residual impacts, ie, those after mitigation is taken into account are not considered to be significant.

Transport

Baseline/Existing Conditions

- 6.12 The site is located north of the eastbound entry slip road to the A2, which forms part of the Strategic Road Network (SRN), and east of the junction with Wrotham Road. The site is located within the Green Belt but in the partially urbanised fringe of Gravesend and Northfleet (to the north), with the A2 (to the south) marking a clear *de facto* boundary between settlement and open countryside, given that it is a prominent, recognisable and permanent physical feature.
- 6.13 Historically, the site was located to the south of a slip road to the former line of the A2 trunk road, before the A2 was relocated southwards in 2009 by the Highways Agency (now National Highways). The old route of the A2 is the basis of current Green Belt boundaries in this area, but the movement of the A2 southwards essentially moved the boundary between town and countryside southwards, resulting in the inclusion of the site within the settlement fringe, inside the A2 (as indicated above). The former use of the site as a Hotel and roadside pub served through traffic using the A2. An existing petrol filling station is located to the north of the site, on the former slip road to which is now a cul-de-sac.
- 6.14 The site's location is adjacent to the A2's junction with Wrotham Road and has an existing access onto the northern roundabout serving the junction, and is therefore well located along the SRN and primary local access routes to Gravesend and Northfleet. It is easily accessible to traffic travelling in both directions on the A2, and north and southbound traffic entering and leaving Gravesend on Wrotham Road, and therefore well located to provide a flagship (primarily) EV charging station that would serve local and strategic needs.
- 6.15 Further, the location of the site, at one of the main accesses in and out of Gravesend and Northfleet settlements, makes it highly prominent, and a key gateway to the settlements. The current development on site, whilst capable of being maintained and brought back into hotel and restaurant use, is in large part of a very poor visual appearance. The planning application provides a clear opportunity for the site to be thoughtfully redeveloped to provide a more appropriate and attractive local gateway to the settlements.
- 6.16 There are existing cycle and pedestrian paths within close proximity to the site, providing access to the urban area of Gravesend and Northfleet to the north.

- 6.17 The existing site is covered by extensive hardstanding (6,688 sqm) which would have accommodated car parking associated with the hotel use.

Access Proposals

- 6.18 The proposed development includes retention of the existing vehicular access to the site, which comprises a dedicated arm of the A227 Wrotham Road / A2 eastbound slip road roundabout. The access road would be widened to between 5.5m and 6.2m to ensure larger vehicles can access the site.
- 6.19 Visibility splays and swept path analysis undertaken by Markides confirm that the proposed site access arrangements and site layout could safely accommodate a range of vehicles, including refuse, delivery and fuel tankers.
- 6.20 The proposed development will connect to the existing cycle and pedestrian paths adjacent to the site and will ensure dedicated pedestrian routes into the site are level, hard surfaced and clearly delineated where they cross car parking areas. Safe access to the cycle store is provided.

Impacts

- 6.21 As agreed at the pre-application stage with both Kent County Council (KCC) and National Highways (NH) it is assumed that all trips accessing the site are existing, forming either pass by or diverted movements. The proposed development would therefore have no impact in this regard.
- 6.22 On review of the trip impacts at the above locations, it is noted that the primary development impact occurs at the A227 Wrotham Road / A2 eastbound slip road / Site Access roundabout and the A227 Wrotham Road / A2 westbound slip road roundabout, with no net change in vehicle movements for the A227 Wrotham Road / Coldharbour Road / Wrotham Road roundabout. Therefore, detailed junction capacity assessments have been undertaken for the latter two junctions.
- 6.23 On review of the queue data and associated capacity modelling completed in support of the proposals, it is considered that the net impact of the proposals at the A227 Wrotham Road / A2 eastbound slip road / Site Access roundabout will be accommodated as part of the existing junction arrangement, with no 'severe' impact foreseen. Minor changes are proposed on the Site Access arm of the roundabout to accommodate the movements of larger vehicles, which offer capacity benefits also. For the A227 Wrotham Road / A2 westbound slip road roundabout mitigation measures are required on the A2 off slip, comprising revisions to the existing lane markings to allow for right turning vehicles to use both lanes. It is, therefore, considered that the proposed development along with the package of mitigation measures results in no 'severe' highways impacts in the context of Paragraph 115 of the National Planning Policy Framework.
- 6.24 A merge / diverge assessment has been completed with respect to the A2 east and westbound slip road roundabouts indicates that the proposed development in isolation will not materially impact the slip road arrangement. It is, therefore, not considered that any mitigation measures are warranted at these locations.

Mitigation

- 6.25 No mitigation is necessary, and the effects of the Proposed Development are not considered to be significant.

Drainage and Flood Risk

Baseline/Existing Conditions

- 6.26 The Site is located within Flood Zone 1, and is at a very low risk of flooding from surface water and low risk from ground water. The flood risk from all identified sources is therefore negligible/low and no specific flood risk measures are proposed.
- 6.27 It is also noted that the site is located within Zone II – Outer Protection (SPZ2) designated groundwater source protection zone. Pollution control measures are specified within the Flood Risk and Drainage Assessment to mitigate the potential pollution hazard on site associated with the PFS element of the proposed development. In summary:
- The use of filter drains, and permeable block paving will also help prevent debris from entering the surface water drainage system, reducing the risk of blockage.
 - Class 1 full retention separators will be installed to serve the petrol filling station and will capture hydrocarbon pollutants, along with any fuel spillages, preventing them from entering the surface water drainage system.

- A Class 1 bypass separator will be installed to serve the parking area and will capture hydrocarbon pollutants preventing them from entering the surface water drainage system.
- In addition to the above water quality measures, the building will consist of a green roof while catchpit manholes and silt traps in gullies/channels drains will help prevent contaminants effecting the principal aquifer and the SPZ2 designated groundwater source protection zone.

6.28 It is therefore considered that the proposed development appropriately mitigates against any potential drainage impact arising to the SPZ2.

Potential Impacts

6.29 Potential impacts to flooding from the various sources are considered to be negligible, due to a number of surface water drainage measures are proposed, including SUDS measures such as two geo-cellular infiltration tanks and an infiltration basin. The required storage volumes have been sized to store the 1 in 100 AEP rainfall event including a 45% increase in rainfall intensity to allow for climate change in accordance with national guidance surfaces at the redeveloped site.

Mitigation

6.30 The surface water drainage strategy will be designed in accordance with appropriate guidance to reduce surface water discharge rates and lower the risk of flooding downstream.

6.31 It is proposed to dispose of surface water by infiltration to the ground, which is the preferred option in the drainage hierarchy.

6.32 Notwithstanding that the site is within Flood Zone 1 and has a very low risk of flooding from surface water and low risk from ground water, it is recommended that the finished floor level of the proposed sales building is at least 150 mm above adjacent ground levels, with ground levels sloping down from the building.

Air Quality

Baseline/Existing Conditions

6.33 The Site is located within an Air Quality Management Area (AQMA).

Potential Impacts

6.34 An Air Quality Assessment has been prepared by Wardell Armstrong LLP which identifies a medium risk of dust soiling effects from the construction and demolition phase of the proposed development, and a low risk to human health.

6.35 During its operational phase the proposed development would result in concentrations of pollutants from vehicular emissions below the air quality target values. The impact of the proposed development of existing air quality and air quality sensitive receptors is therefore predicted to be negligible and air quality effects not significant. This is due to the nature and use of the proposed development, which would divert vehicles already on the road network as opposed to generating new trips.

6.36 The Air Quality Assessment confirms that the proposed development would not give rise to an unacceptable risk from air pollution, or to any breach in national objectives. Further, it must be recognised that a key driver of the development will be to assist in the shift from internal combustion vehicles to electric vehicles, which in itself will bring benefits in air quality

Mitigation

6.37 The mitigation measures proposed for dust control during the construction phase are as follows:

- Communications:
 - Develop and implement a stakeholder communications plan that includes community engagement before work commences on site.
 - Display the name and contact details of person(s) accountable for air quality and dust issues on the site boundary.
 - Display the head or regional office contact information.
- Site management:
 - Record all dust and air quality complaints, identify cause(s), take appropriate measures to reduce emissions in a timely manner, and record the measures taken.
 - Make the complaints log available to the local authority when asked.

- Record any exceptional incidents that cause dust and/or air emissions, either on- or offsite, and the action taken to resolve the situation in the logbook.
- Monitoring:
 - Undertake daily on-site and off-site inspection to monitor dust, record inspection results, and make the log available to the local authority when asked.
 - Carry out regular site inspections to monitor compliance with the Dust Management Plan (DMP), record inspection results, and make an inspection log available to the local authority when asked.
 - Increase the frequency of site inspections by the person accountable for air quality and dust issues on site when activities with a high potential to produce dust are being carried out and during prolonged dry or windy conditions.
- Preparing and Maintaining the Site:
 - Plan site layout so that machinery and dust causing activities are located away from receptors, as far as possible.
 - Erect solid screens or barriers around dusty activities or the site boundary that are at least as high as any stockpiles on site.
 - Fully enclose the site or specific operations where there is a high potential for dust production and the site is active for an extensive period.
 - Avoid site runoff of water or mud.
 - Keep site fencing, barriers, and scaffolding clean using wet methods.
 - Remove materials that have the potential to produce dust from the site as soon as possible, unless being re-used on site. If they are being re-used on-site, cover them appropriately.
 - Cover, seed, or fence stockpiles to prevent wind whipping.
- Operating vehicle/machinery and sustainable travel:
 - Ensure all vehicles switch off engines when stationary - no idling vehicles.
 - Avoid the use of diesel or petrol-powered generators and use mains electricity or battery-powered equipment where practicable.
 - Impose and signpost a maximum-speed-limit on haul roads and work areas.
 - Produce a Construction Logistics Plan to manage the sustainable delivery of goods and materials.
 - Implement a Travel Plan that supports and encourages sustainable travel.
- Operations:
 - Only use cutting, grinding, or sawing equipment fitted or in conjunction with suitable dust suppression techniques such as water sprays or local extraction.
 - Ensure an adequate water supply on the site for effective dust/particulate matter suppression/mitigation, using non-potable water where possible and appropriate.
 - Use enclosed chutes and conveyors and covered skips.
 - Minimize drop heights from conveyors, loading shovels, hoppers, and other loading or handling equipment and use fine water sprays on such equipment wherever appropriate.
 - Ensure equipment is readily available on-site to clean any dry spillages and clean up spillages as soon as reasonably practicable after the event using wet cleaning methods.
- Waste Management:
 - Avoid bonfires and burning of waste materials.
- Demolition:
 - Soft strip inside buildings before demolition.
 - Ensure effective water suppression is used during demolition operations.
 - Avoid explosive blasting, using appropriate manual or mechanical alternatives.

- Earthworks:
 - Re-vegetate earthworks and exposed areas/soil stockpiles to stabilize surfaces as soon as practicable.
 - Use Hessian, mulches, or trackifiers where it is not possible to re-vegetate or cover with topsoil, as soon as practicable.
 - Only remove the cover in small areas during work and not all at once.
- Construction:
 - Avoid scabbling (roughening of concrete surfaces) if possible.
 - Ensure sand and other aggregates are stored in bunded areas and are not allowed to dry out.
 - Ensure bulk cement and other fine powder materials are delivered in enclosed tankers and stored in silos with suitable emission control systems.
 - For smaller supplies of fine powder materials, ensure bags are sealed after use and stored appropriately to prevent dust.
- Trackout:
 - Use water-assisted dust sweeper(s) on the access and local roads, to remove, as necessary, any material tracked out of the site.
 - Avoid dry sweeping of large areas.
 - Ensure vehicles entering and leaving sites are covered to prevent escape of materials during transport.
 - Inspect on-site haul routes for integrity and instigate necessary repairs to the surface as soon as reasonably practicable.
 - Record all inspections of haul routes and any subsequent action in a site logbook.
 - Install hard surfaced haul routes, which are regularly damped down with fixed or mobile sprinkler systems, or mobile water bowsers and regularly cleaned.
 - Implement a wheel washing system.
 - Ensure there is an adequate area of hard surfaced road between the wheel wash facility and the site exit, wherever site size and layout permits.
 - Access gates to be located at least 10 m from receptors where possible.

6.38 The proposed mitigation measures are specific to dust control during the construction phase and are based on the IAQM guidance.

Townscape/Landscape Visual Impact

Baseline/Existing Conditions

- 6.39 There are no designations relating to landscaping quality of relevance to the Site, however, it is located within the Green Belt, the Thames Estuary and Marshes Ramsar Buffer and Gravesham Fringe Landscaper Character Area. A Landscape Visual Impact Assessment has been prepared by Huskisson Brown.
- 6.40 The Site itself does not benefit from any significant landscaping, and largely comprises hardstanding and the vacant , but maintained former Tollgate Hotel, which in large part has a very poor visual appearance. In terms of the immediate context, the majority of the vegetation comprises roadside native planting, including native hedges and trees. Indeed, the existing landscaping condition of the site is categorised as very poor, and the surrounding countryside as poor.
- 6.41 To the north east, the boundary abuts the edge of the former A2, now largely marked by hedgerow growth, giving way onto the "green corridor" developed on the former road corridor. The old road surface has been largely broken out and removed to leave a cycleway / footpath, forming part of the regional recreational route, the Wealdway, that crosses Kent and Sussex from the Thames to the south coast. Mounding and planting have been carried out to give some element of visual enhancement and containment. These new landforms appear artificial, but over time they have been softened and screened by the maturing vegetation.
- 6.42 National Cycle Route 177 follows the former A2 alignment offset from the site's northern boundary, sharing the corridor with the Wealdway.

- 6.43 The eastern boundary of the motel site is formed by a fence and abuts unmanaged land with ruderal vegetation that used to be an arable field with a hedgerow separating the land from the site. The hedgerow adjacent to the fence is offsite but there is a small area of vegetation within the site abutting the southern end of the hedgerow.
- 6.44 The southern boundary is marked by a site hoarding set to the rear of the verge of the eastbound slip road from the northern roundabout of the A227 Wrotham Road that gives access to the A2. This road passes the site, raised above it on an embankment, the slip road climbing to the east on a similar gradient to the sloping site.
- 6.45 South of the new A2 is another narrow band of land, heavily planted as a screen to the Channel Tunnel Rail Link (CTRL) that runs parallel with the A2, set in a wide corridor in a cutting.
- 6.46 The western boundary follows a generally curved line that appears to relate to the former road alignment and access arrangements, but which now slightly divorces the site from the new road frontage because of the open land between the new A2 - A277 roundabout and the site. The control / ownership of this land is assumed to be vested in the Highway Authority. A rather elongated access road now links between the new roundabout and the site's western frontage.
- 6.47 The baseline assessment undertaken by Huskisson Brown concludes that the landscape condition of the site as it now exists is considered to be very poor and its landscape value is poor.

Potential Impacts

- 6.48 The proposed development will result in a wholesale change to the character of the Application Site, including the clearance of the whole of the former site
- 6.49 The proposed development would improve the site features by replacing the dilapidated, vacant buildings with a high-quality development comprising less built form and volume than the existing, complimented by an extensive landscaping and planting scheme.
- 6.50 The LVA concludes that, whilst inevitable the proposal would result in change to the character of the site, there is very little potential for landscape or visual impacts arising from the development.
- 6.51 The landscape and visual assessment within the LVA also shows, that the proposed would result in a modest landscape benefit whilst the visual assessment has found a somewhat greater level of benefit would arise in visual amenity terms for visual receptors from the proposed scheme as compared to the Option (b) and Option (c) fallback positions¹.

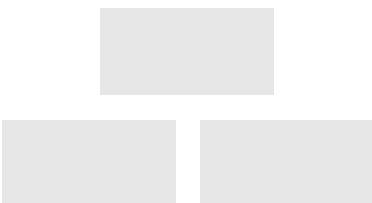
Mitigation

- 6.52 Landscape proposals have been integrated into the design of the proposed development along with the engineering proposals. The proposed landscape strategy would introduce new planting, including substantial tree planting, and landforms that would visually enhance the proposed development facilitating its integration into the surrounding landscape and with the green corridor in which the site sits. The range of landscape measures would further assist in achieving some of the Restore and Create objectives identified in the Gravesend Landscape Character Assessment.
- 6.53 The proposed development would also improve the overall appearance of the approach to Gravesend from Wrotham Road and A2, creating a new landscape identity for the redeveloped site with regard to its as it lies in something of a local 'gateway' location.
- 6.54 The LVA has considered the effect of the proposed development on the Green Belt, in particular on its openness and in the light that the perception of the proposed development and the extent of operational development all form part of the consideration of openness. It is concluded that there would be clear and very positive benefits to the openness of the Green Belt and its perception arising from the implementation of the proposed development on account of a decrease in built form as well as an increase in areas of landscaping on the site. On this basis, the openness of the Green Belt would not be harmed by the proposed development but would be notably enhanced at a local level.
- 6.55 As identified above, the proposed development would have a positive impact compared to the existing site situation with regard to landscape visual impact. The effects of the development are therefore not considered to be significant, in the context of the EIA regulations.

7 CONCLUSIONS

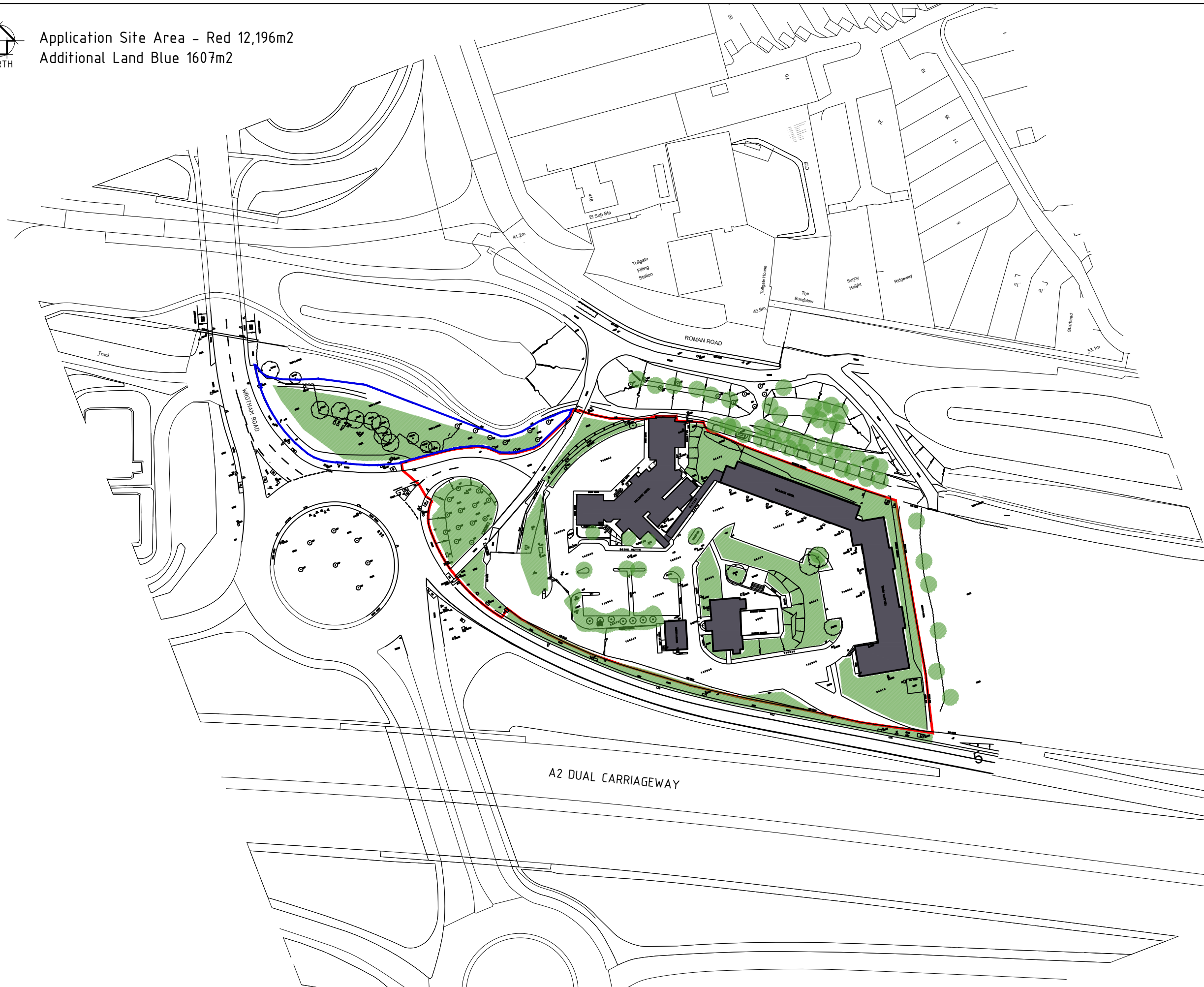
- 7.1 The PPG on Screening Schedule 2 developments states “Only a very small proportion of Schedule 2 development will require an assessment...”.
- 7.2 The proposed development is not located within a sensitive area as defined by the Regulations. However, it does fall under Schedule 2 category 10b as an urban development project where the proposal exceeds 1ha of non-dwellinghouse development. However, this exceedance merely triggers the need for a Screening Opinion and does not imply that an EIA will be necessary, as this depends on the sensitivity and characteristics of the site and the likelihood of significant environmental effects arising from its development.
- 7.3 The proposal delivers a range of measures embedded into the scheme and through mitigation / avoidance / pre-cautionary measures directed at matters such as highways, flood risk and drainage, noise, air quality and ecology.
- 7.4 The proposed development is not considered to be of a significantly greater scale than prevailing in development in the surrounding area, and would indeed have a reduced impact comparative to the existing site situation and fallback positions. Nor are the types of impact anticipated to be markedly different nature. Furthermore, the development would not result in significant effects or contribute to significant effects in accumulation with other development in the area.
- 7.5 The evidence presented in this Screening Opinion Request Report demonstrates that there is no reasonable likelihood of significant environmental effects arising from either the future construction or operation of the development, provided that conventional and proportionate planning controls are imposed upon the development and encompassing the identified embedded mitigation. The proposed development is not EIA Development as defined by the EIA Regulations. Accordingly, with reference to the EIA Regulations and accompanying Government guidance, the Council should conclude that formal EIA is not required.

Location/Identification Plans





Application Site Area - Red 12,196m²
Additional Land Blue 1607m²



**	*****	*****
**	*****	*****
**	*****	*****
**	*****	*****
E	10.05.24	REDLINE AREA CO ORDINATED TO OTHER DOCS
D	30.04.24	FURTHER ADJUSTMENT TO BLUELINE
C	19.04.24	FURTHER ADJUSTMENT TO REDLINE
B	25.03.24	AMENDED RED AND BLUE LINES TO HIGHWAYS INFO
A	01.02.24	AMENDED AREA

NR	DATE	DESCRIPTION
REVISIONS		
STATUS		



BP Pulse Breckland, Linford Wood Milton Keynes Buckinghamshire MK14 6GY		TOLLGATE SERVICE AREA WATLING STREET GRAVESEND KENT DA11 7NP	
DRAWN: PB DATE: JAN 24 DESIGN CHECKED: AM DATE: JAN 24 APPROVED: ***** DATE: *****		OS LOCATION PLAN	
DATE: JAN 24 SCALE: 1:1250@A3		ARCHITECT: MBH	

BP DRAWING NUMBER		REV
EV005-PS-LAY-000-GB00015044-0001-001		B01

MBH DRAWING NUMBER		REV
14170-LOC		E

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For further details contact:

Kathryn McCain

07443 053716

Kathryn.mccain@rapleys.com

66 St James's Street St James's
London SW1A 1NE

Rapleys LLP is registered as a Limited Liability Partnership in England and Wales.
Registration No: OC308311. Registered Office at Unit 3a, The Incubator, The Boulevard,
Enterprise Campus, Alconbury Weald, Huntingdon, PE28 4XA. Regulated by RICS.

rapleys.com
0370 777 6292

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