



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

From: Michelle Berrington (Head of Planning & Development)
Operations Directorate
South East Region
National Highways
Planningse@nationalhighways.co.uk

To: Gravesham Borough Council (FAO Alison Webster)
planning.reps@gravesham.gov.uk

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 March 2025
Name: Nigel De Wit	
Position: Assistant Spatial Planner	
National Highways	
Bridge House, 1 Walnut Tree Close, Guildford, Surrey, GU1 4LZ	
www.nationalhighways.co.uk	

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 June 2025**.

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.

We have reviewed the application including the supporting Transport Assessment (TA) and the Transport Assessment Addendum (TAA). We engaged with pre-application discussions with the applicant's consultants.

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 have set out below our response including actions points (**bold and underlined text**) for the applicant to respond to:

EV Charging Hub

The proposal for 24 charging bays and supporting electrical infrastructure supports the Government's wider ambitions and commitments for decarbonising transport and Net Zero.

Confirmation of Committed Developments from the Local Planning Authority (LPA)

We acknowledge Appendix D of the TAA contains correspondence from the LPA confirming the list of committed developments to be considered.

A227 Wrotham Road/ A2 Eastbound Slip Road/Site Access Roundabout – ARCADY Assessment

We advised at the pre-application stage that the calibration/validation of the 2023 base model of this junction is required to be improved so that it more accurately represents

typical operating conditions at this junction during the morning and evening peak hours.

The model has been calibrated / validated against mean queue data within the survey peak hour, this is not the correct approach. **The requirement is that the model is calibrated / validated against the highest of the '15-minute average' queues observed on each arm. The reason for this is that the ARCADY output represents the worst 15-minute results on each arm. We require this matter to be addressed as the current calibration/validation which has been undertaken has significantly improved the performance of the A227 (north) arm (the direct intercept adjustment which has been input is an increase of 750 PCU/hr).** We acknowledge that direct intercept adjustment is the method of Junctions calibration which we require.

We note the link that is provided is to TRL frequently asked questions. We do not accept this as this does not clearly articulate the requirements. Mean queues are appropriate for LinSig and TRANSYT, but for Junctions the queues that are required are the highest 15-minute average on each arm. To be explicitly clear, what we require is the average queue within each of the modelled 15-minute time segments to be identified for each arm. Note, this is the total queue on the arm, the sum of each of the lanes. Then, the highest '15-minute average' queue on each arm in each time period is required to be utilised for calibration/validation purposes.

The soft copy Junctions file should be submitted to allow us to verify.

A227 Wrotham Road/ A2 Westbound Slip Road Roundabout – ARCADY Assessment

The comments for this junction mirror those provided for the junction above.

In addition, we previously noted that if lane simulation is to be used for the mitigation, then lane simulation should also be used for the calibrated / validated model of the existing layout and this is confirmed to have been undertaken.

SRN Mitigation

We have investigated the committed highway mitigation scheme associated with planning application GR20141214 (Land at Coldharbour Road). We note the decision notice contains the condition (condition 34) that no more than 200 dwellings shall be occupied until the A2 (westbound) / A227 junction is improved as shown on drawing No.PHCOLDHARBOURRD.1/01 (available on the LPA planning portal). Planning permission 20211416 amended the trigger for compliance with condition 34 from a trigger of 200 dwelling occupations until the completion of the improvement to the A2 (west)/A227 junction (as shown on drawing no. PHCOLDHARBOURRD.1/01, or such other scheme of works or variation substantially to the same effect, as may be approved) to such highway improvements to be commenced prior to Friday the Fifth

of August 2022 and completed thereafter within 9 calendar months.

The committed mitigation scheme comprises signalisation of the A2 (westbound) off-slip approach together with the 'filling in' of the northern part of the southern roundabout circulatory carriageway, converting from dumbbell arrangement to dogbone arrangement at the southern roundabout.

We acknowledge the subsequent design drawings (these are not on the LPA planning portal) as follows:

- Drawing no. 684437CH-JAC-A2-HGN-DR-1200-001 Rev P01 (17/08/2020) – this drawing provides details of the traffic signals – we note, however this drawing appears to show the existing road marking on the A2 off-slip
- Drawing no. HE601722-AONE-HGN-A2-A227-WROT-DR-C-0001 Rev P01 (dated 09/10/2020) – this drawing is the general arrangement plan and we would suggest this should be referred to for the proposed layout, as we note the arrangement on the A2 off-slip differs from the existing layout shown on the traffic signals drawing and would provide enhanced performance.

The junction assessment which has been undertaken in association with the Former Tollgate Hotel has considered planning application GR20141214 (the portion which is assumed to be not yet occupied) generated traffic within the committed development assumptions. However, the applicant has not currently considered the committed mitigation scheme.

We note that the Former Tollgate Hotel currently proposed mitigation scheme (shown on drawing no. 22052-MA-XX-DR-C-0102 Rev P02) conflicts with the committed mitigation scheme associated with planning application GR20141214.

The applicant should undertake additional junction assessment both without and with the committed mitigation scheme at this junction. This will allow determination of the impact of the committed mitigation scheme and whether any other mitigation is required in addition to the committed mitigation scheme.

Merge/Diverge Assessment

We requested at the pre-application stage that merge/diverge diagrams are provided to support the assessment. These are confirmed to be included within Appendix K of the TAA. The merge / diverge assessment, updated to reflect the committed development, concludes there is no requirement for mitigation in respect of the merges/diverges. This is accepted.

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 June 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.