

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

Planning; Design & Access; Statement of Community Involvement and
Sustainability & Energy Statement for BP Pulse

16 September 2024

Our Ref: 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.

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1 INTRODUCTION

1.1 This Planning Statement, Design and Access Statement, Statement of Community Involvement and Sustainability & Energy Statement (the statement) has been prepared on behalf of BP Pulse (the applicant) in respect of development proposals at the Tollgate Hotel site, Wrotham Road, Gravesend (the site). The site's location plan is at **Appendix 1**, with the red line illustrating the application site boundary. All land within the red line is in the ownership of the applicant.

1.2 The description of the development proposals (the proposed development) is below:

"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."

STRUCTURE OF THE PLANNING STATEMENT

1.3 This statement addresses the key considerations relevant to the proposed development and covers the following matters:

Section 2: Site and surroundings
Section 3: The proposals
Section 4: Design and access considerations
Section 5: Sustainability assessment
Section 6: Planning history
Section 7: Planning policy and guidance
Section 8: Pre-application engagement
Section 9: Statement of community involvement
Section 10: Alternatives to the current development proposals
Section 11: Planning considerations
Section 12: Planning benefits
Section 13: Conclusions

CONTENTS OF PLANNING APPLICATION

1.4 This statement should be read in conjunction with the following supporting documentation submitted in draft as part of this pre-application approach:

- Site location plan;
- A suite of application drawings, including layout plans and landscaping details, floor and roof plans, elevations and cross sections;
- Transport Statement;
- Ecological Impact Assessment;
- Bat Surveys;
- Landscape and Visual Appraisal (LVA);
- Landscaping Plan;
- Biodiversity Strategy;
- Phase 1 Contamination Desk Study Report;
- Air Quality Assessment;
- Noise Assessment;
- Lighting Assessment;
- Archaeological Assessment;
- Arboricultural Impact Assessment;
- Flood Risk and Drainage/SUDS Assessment;
- Heritage Assessment; and
- Fuel Tank Risk Assessment.

- 1.5 The application submissions conclude that the proposed development is acceptable, in accordance with the Development Plan and should be granted planning permission without delay.
- 1.6 In parallel to the full application, an EIA screening request will be submitted to the local authority, confirming why it is considered an Environmental Statement (ES) is not required.

2 SITE AND SURROUNDINGS

2.1 This section addresses the site and its surroundings in overall terms.

SITE

2.2 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. As shown on the Existing Site Layout (Drawing Ref. EV005-PS-LAY-000-GB00015044-0003-001 B01) included in **Appendix 2** the site comprises:

- 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.

2.3 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.

2.4 The extent of existing development in terms of built form is included within the schedule attached at **Appendix 3**.

2.5 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.

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

SURROUNDINGS

2.7 As shown on the site's location plan (**Appendix 1**) the southern boundary of the site is shared with the eastbound entry slip road of the A2 dual carriageway.

2.8 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.

2.9 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.

2.10 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.

2.11 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.

2.12 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.

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

3 THE PROPOSED DEVELOPMENT

3.1 Planning permission is sought for the following:

"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."

3.2 For full details of the proposal, please refer to the suite of plans prepared by MBH Architecture submitted as part of the planning application. In summary, 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:
 - 33 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 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-west 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.
 - Landscaping around the perimeter of the site and within in it, to screen and create a soft interface between the development and the surrounding area.

- 3.3 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.

4 DESIGN AND ACCESS CONSIDERATIONS

4.1 This section reviews matters relevant to design and access considerations, by way of a Design and Access Statement. Specifically:

- It provides the evaluation of the site which informed the development;
- The design principles taken relative to the proposed development, and
- A review of access arrangements.

EVALUATION

4.2 This section summarises the key issues which informed the development's design principles and solutions. Effectively, it balances the site's opportunities and constraints, arising from the assessment and design stages.

4.3 The opportunities and constraints pertaining to the site can be summarised as follows.

The Location of the Site

4.4 As previously discussed, 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.

4.5 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 which is now a cul-de-sac.

4.6 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. The site is therefore well located to provide a flagship (primarily) EV charging station that would serve local and strategic needs.

4.7 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.

Land Use

4.8 As identified above, the site is located within the Green Belt and accommodates a number of vacant but maintained buildings which remain capable of being brought back into use as a hotel and restaurant, including:

- A single and two storey building of a mock-Tudor style in the north-west corner of the site;
- A two storey "L" shaped flat roofed block, accommodating the former hotel rooms, adjoining the northern and eastern boundaries of the site, and
- Two single storey buildings centrally located within the site.

4.9 The rest of the site accommodates maintained hardstanding, other paved areas and amenity landscaping, all in the curtilage of the above buildings, and largely enclosed by them.

Layout, Height and Volume

4.10 The proposed layout of the site needs to respect the site's Green Belt location, and consideration of the site's topography is therefore integral to informing a well-designed development that minimises impact on the Green Belt in terms of openness and visual prominence. Consideration also needs to be given to the presence of neighbouring development which forms an urban backdrop to the site.

- 4.11 The current buildings on the site are quite prominent and visible in views from the west and the A2 and its eastbound exit slip road, as a result of topography. The sloped topography of the site therefore needs to be considered as part of the site's re-design, particularly on the higher eastern part of the site, given the wider views it is afforded from the west.
- 4.12 Given the height, massing, volume and siting of the existing built form on site (buildings and hardstanding cover almost the entirety of the site – see breakdown of areas in **Appendix 3**), there is ample opportunity to provide improvements to the visual amenity and sense of openness through a carefully considered redevelopment of the site.

Access and Parking

- 4.13 As identified above, the site is located to the north of the eastbound entry slip road to the A2 with access provided by a dedicated arm off the A227 Wrotham Road A2 eastbound slip road roundabout. The site is immediately south of the Urban Development Boundary of Gravesend (see previous comments relating to the historic context of this boundary), and the nearest train station is Gravesend Station 1.8 miles to the north of the site.
- 4.14 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.
- 4.15 The existing site is covered by extensive hardstanding (6,688 sqm) which would have accommodated car parking associated with the hotel use.

Landscaping and Setting

- 4.16 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 (see the LVA for a full assessment of the existing landscaping condition of the site and surrounding countryside).
- 4.17 There are therefore significant opportunities for the enhancement of landscaping.
- 4.18 The landscaping strategy should create visual interest within the site, whilst helping screen and soften views of the development to improve the visual amenity of this key gateway location into Gravesend, whilst preserving the openness of the Green Belt.

Summary

- 4.19 From the foregoing commentary, it is evident that the site offers significant potential to redevelop a vacant and underutilised prominent brownfield gateway site for the provision of considered alternative development. Furthermore, the proposed development offers an opportunity to reduce the built form and volume of development on site, whilst providing landscaping and biodiversity enhancements, thereby improving the site's contribution to biodiversity and the Green Belt.

DESIGN PRINCIPLES

- 4.20 Any development on the site should – as far as possible – be policy compliant and be sympathetic to the physical characteristics of the surrounding area. In light of this assessment, it is considered that a flagship EV charging facility with an associated amenity/sales building of circa 450sqm, 24 EV charging, 35 additional customer bays and 4 staff bays is appropriate in this location given its connectivity to the A2 and the identified need for EV charging Infrastructure in the area (see documents at Appendix 9 and 10).
- 4.21 The aspects that should be considered in assessing this proposal in terms of the design and access statement are use, layout, the amount of development, scale, landscaping and design. Each issue is discussed, in turn, as follows:

Use

- 4.22 On 12 February 2020 BP announced its new ambition to become a net zero company by 2050. This aspiration covers BP's greenhouse gas emissions from its worldwide retail operations, as well as the carbon in the oil and gas that it produces. BP's ambitions accord with the nationwide shift away from hydrocarbons to a net zero transport future, as confirmed and led by central government and enshrined in the national legislative and policy frameworks.
- 4.23 In this context, the proposed use of the site as a flagship EV charging facility is in line with, and is an integral facilitator of, central government's agenda to transition to low carbon transport systems (see the Section 8 of this Planning Statement for a full assessment of the principle of development, as supported by the local and national need for EV).

- 4.24 As previously identified, the site is previously developed land that was formerly in use as a roadside hotel. Benefiting from connectivity to the A2 and its gateway location into Gravesend, the site is ideally located for BP's aspirations for an EV charging facility and associated amenity/sales building and ancillary petrol offer.
- 4.25 With its ultra-rapid charging offer providing 80% charge in circa 20 minutes (depending on vehicle type), and accessibility to the A2 and Gravesend, the proposed development would serve both a strategic need, catering to users of the A2, and a local need. The proposed amenity/sales building would provide an area for customers to rest and relax whilst their vehicle charges.
- 4.26 An ancillary petrol filling element is proposed to ensure the viability of the scheme whilst the nationwide shift to low emission vehicles gains momentum. It is understood that the petrol filling element could be adapted to provide further EV charging bays to reflect changing market demand.

Layout

- 4.27 The layout and siting of the development has been carefully considered, taking into account the site's topography, the location of the existing built form, vegetation and views of, and around, the site. The result is a development that sits comfortably within the landscape, with minimal visibility from the surrounding area, and a notable reduced built form comparative to the existing.
- 4.28 The sales building has been located centrally within the site to maximise opportunities for landscaping on all sides, with the EV charging bay located around the central sales/amenity building. The layout of the car parking and ancillary features has been carefully considered to ensure smooth and uninterrupted traffic flow throughout the site for the ease and safety of users (please refer to the Transport Statement for full details on the movement of vehicles within the site).
- 4.29 The ancillary petrol filling element is located to the east of the sales/amenity building and is covered by a canopy to provide shelter to customers during use. It is proposed to lower ground levels in this part of the site and provide a retaining wall to the north-eastern corner, ensuring the petrol filling element sits low within the site and its setting.
- 4.30 Soft landscaping and tree planting is proposed around the site, particularly along the eastern, western and southern boundaries to provide a green buffer, and restrict views to the site, whilst providing biodiversity and amenity improvements.
- 4.31 Care has been taken to ensure safe movement for pedestrians and cyclists through the site, with links provided to the existing pedestrians paths and cycle lanes adjacent to the site, to ensure the proposal is safe and accessible for a range of users.

Scale

- 4.32 The importance of scale and volume in the context of the site's Green Belt location is acknowledged, and the best indicators of scale are that of footplate and height. In terms of height, the proposed elevations (drawing ref. V005-PS-LAY-000-GB00015044-0004-001) confirm the development sites comfortably within the landscape. The proposed sales/amenity building has a maximum height of 5.5m, and the canopy over the petrol filling element would be 4.4m. With the level reduction across part of the site, the top of both, the sale building and the canopy would thus be significantly lower than the highest elements of the existing buildings on site.
- 4.33 In terms of floorplate, it is evident from a comparison of the existing drawings and the proposed, that the proposed development has a significantly smaller building footprint of 450sqm compared to the existing of 1,926qm. This represents a substantial reduction in footprint of 75.03%, and a significant reduction in built volume on site of 74.82% (as confirmed in the existing and proposed volume calculations included in **Appendix 16**).
- 4.34 Further, as identified above, the site is well contained, and sufficiently separated from the urban area of Gravesend and would therefore have no impact on adjacent properties in terms of overbearing impact or loss of outlook. The scale of the development has been informed by the site context, and will represent a marked reduction of built form comparative to that currently on site, and is therefore considered entirely appropriate.

Landscaping

- 4.35 A Landscaping Plan has been prepared by Huskisson Brown Associates (drawing ref. HBA-664-001 Rev C), which has sought to maximise opportunities for soft landscaping and the creation of habitats across the site. The majority of the landscaping is proposed along the perimeter of the site, softening views of the site and improving the amenity and biodiversity value for the site itself. In summary, the landscaping strategy includes the provision of:
- 159sqm of retained and enhanced neutral grassland

- 1,088sqm proposed traditional orchard
- 1,398 sqm proposed woodland and shrub planting
- 484sqm proposed native mixed scrub planting
- 1,571sqm proposed native hedgerow
- 981sqm proposed neutral grassland
- 146sqm proposed ground cover planting with climbers to green gabion wall
- 381sqm proposed sedum roof
- 674 sqm proposed mown grass strip
- 90sqm proposed infiltration basin vegetation
- 57 proposed native trees

Appearance

- 4.36 The proposed sales/amenity building comprises a single storey rectangular building partially skirted by a semi-transparent canopy providing cover to EV charging bays that are located off the north, east and west sides of the building.
- 4.37 In terms of materiality, the sales building is clad in brick, with sections of glazing around the entrances. A sedum roof is proposed, which will help blend the building in with the surrounding landscaping whilst providing biodiversity improvements.
- 4.38 The proposed development represents a substantial improvement comparative to the existing visually poor built form in terms of quality of design, condition, scale, massing and layout, and would substantially improve the character and appearance of the site and surrounding area.

SUMMARY

- 4.39 The design of the proposed development is based on a thorough contextual understanding of the site, its constraints and topography. Care has been taken to ensure delivery of a development that sits comfortably within its setting, with minimal views afforded from outside the site. Landscaping, planting and a sedum roof have been used to further reduce and soften the visual impact of the site, whilst improving its amenity and biodiversity value.
- 4.40 The proposed development is considered to represent a substantial improvement comparative to the existing site conditions by replacing a visually prominent and somewhat unsightly collection of buildings, with a smaller, high-quality development with ample soft landscaping.

ACCESS ARRANGEMENTS

Access to the Site

- 4.41 It is proposed to retain the existing vehicular access to the site from the surrounding road network. The access comprises a dedicated arm off 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.
- 4.42 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.

Layout of Site

- 4.43 The internal layout of the site as it relates to vehicular and pedestrian traffic has been carefully considered by Markides Associates and MBH Architecture to ensure the development delivers a strategy and layout that meets the needs and demands of the intended use.
- 4.44 Care has been taken to develop a layout that allows vehicles to traverse through the site and arrive at either the petrol filling pumps or EV charging facilities with ease, whilst allowing vehicles to circle back around the site without exiting the site, should either element be fully occupied at the time of their arrival. The proposal layout has been designed to avoid congestion within the site.
- 4.45 Furthermore, the layout of the EV bays is such that it optimises opportunities for users to find available bays through development of a circular flow of traffic.
- 4.46 The site will be well signposted to ensure safe and efficient movement through the site for all users.

Vehicle and Cycle Parking

- 4.47 In addition to the 24 EV charging bays, 12 petrol filling pumps and two dedicated air/water bays, 37 customer parking bays are provided (including four disabled bays) to allow customers seeking to utilise the amenity shop only to do so, and to provide space for customers to wait should the EV bays be fully occupied at the time of arrival. Four separate staff parking bays are also provided.
- 4.48 Six covered cycle parking spaces will be provided for staff and visitors to the site, with sufficient space around the site for future expansion, as needed. Given the nature of the use and number of staff required at any one time (between 8 and 10), it is considered that this level of parking is suitable.

SUMMARY

- 4.49 As identified above, given the nature of the development as an EV charging facility catering to the SRN and local need, vehicular movement and access have been integral to the development's design. The proposed movement strategy through the site has been carefully considered to ensure the site is easily navigable by vehicular users, and opportunities to re-circle the site and EV charging bays is provided without the need to first re-enter the SRN.
- 4.50 The needs and safety of pedestrians and cyclists have also been taken into consideration, to ensure the proposed development caters to the needs of all users.

5 SUSTAINABILITY ASSESSMENT

5.1 This section of the Statement describes the sustainability credentials of the proposed development. As agreed with the local authority during pre-application discussions, as Gravesend has not adopted formal guidance or standards relative to this matter, this sustainability assessment is non-technical in nature, and outlines the sustainability credentials of the development.

5.2 BP Pulse are committed to supporting the transition to a net zero future and are actively engaged in the development and implementation of publicly available EV charging infrastructure. BP Pulse are actively rolling out the maximum number of EV charging points nationwide in their effort to facilitate the take up of EV vehicles in place of traditional combustion engines.

Sustainable Design and Construction

5.3 Sustainable design principles have been considered throughout the design process to ensure the development is climate aware and minimises its environmental impact. To meet BP Pulse's sustainability objectives, the proposed development has been designed to:

- Reduce demand for energy where possible;
- Ensure energy is used efficiently; and
- Supply energy from certified renewable energy sources.

5.4 Throughout the construction phase, the following initiatives will be used:

- Application of waste hierarchy principles to ensure recycling and recovery are attempted before disposal. Where disposal is required, multiple skips will be utilised for proper waste management;
- Reduction in carbon footprint through employment of local suppliers, labour, and supplies where possible; and
- Implementation of a stringent pollution prevention policy where water use, and consumption is strictly monitored.

5.5 BP's selected contractor will have a certification as a Carbon Reduced Organisation by the Carbon Footprint Standard.

5.6 The following measures have been incorporated into the design of the development to reduce the environmental impact of the development and meet sustainability targets:

- The amenity/sales building has been designed to maximise use of natural daylight whilst ensuring the building is thermally efficient. The building will incorporate energy efficient lighting fixtures and promises efficient ventilation and other service functions to help minimise heat loss.
- The amenity/sales building incorporates a sedum roof, in the interest of improving biodiversity on site.
- PV panels are proposed on the canopy covering the petrol filling element.
- The drainage hierarchy has been followed, and the proposed drainage strategy prioritises infiltration as the preferred SuDs measure. An attenuation basin is proposed that has added biodiversity benefits.
- A landscaping plan has been prepared which demonstrates a substantial improvement in the provision of soft landscaping and new trees across the site.
- The development would achieve a BNG of 14.81%.
- Cycle parking is provided and the proposal would link to existing cycle and pedestrian paths, ensuring employees and visitors can access the site using alternative sustainable transport modes.
- Use of water efficient taps and low flush toilets, which reduce water usage.
- Waste recycling facilities, both for customers and commercial waste and a dedicated bottle return scheme.
- The energy used to power the chargers will be REGO (Renewable Energies Guarantee of Origin)-backed.

5.7 The aforementioned environmental sustainability objectives have informed the design of the proposed development, and been a material factor influencing its demolition, construction and operational phases. In addition to incorporating a range of measures to reduce the proposed development's energy consumption and environmental impact, including maximising energy, waste and water

efficiency, and promoting recycling, the proposed use of the site as an EV charging-led hub supplied from certified renewable energy sources only, is itself highly sustainable.

6 PLANNING HISTORY

- 6.1 A planning history schedule, based on information available on the local authority's public online records, is contained at **Appendix 4**.
- 6.2 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.
- 6.3 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.
- 6.4 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. The proposed development is different to the development which was sought in these historic applications. A brief outline of events is set out below, with conclusions drawn as appropriate.

PLANNING APPLICATION REF: 20131018

- 6.5 This planning application sought consent for a petrol filling station and a drive-thru restaurant, and was submitted in November 2013. Planning permission was granted by the local authority in January 2014. However following a legal challenge by the owner of the nearby Shell branded petrol filling station, the local authority signed a consent order in June 2014 quashing this planning permission.
- 6.6 The planning application was reconsidered by the local authority, and granted planning permission a second time in July 2015. However, this was also quashed as a result of a further legal challenge in March 2016. BP made a decision not to proceed with this development, and subsequently this application was withdrawn in November 2017 in favour of a proposal for a petrol filling station without a drive thru restaurant, promoted through application ref: 20160215.

PLANNING APPLICATION REF: 20160215

- 6.7 A planning application for a petrol filling station only (i.e. without a drive thru restaurant) was submitted in March 2016. This application was granted planning permission by the local authority in February 2018, but again this permission was challenged and was quashed by a consent order in June 2018.
- 6.8 An appeal against non-determination was submitted in March 2019. In their report to the planning committee in September 2019 (attached at **Appendix 5**), officers at the local authority recommended a resolution to the effect that – if it had been possible – the local authority would have refused planning permission. This recommendation was confirmed by members in the formal resolution of the local authority.
- 6.9 The putative reasons for refusal of the local authority were based on the following matters, which were considered to be outstanding by the local authority, are as follows:
1. The applicants have failed to demonstrate to the Borough Council, for the purpose of assessing and comparing the proposed use against the previous use of the site, that there is a realistic possibility of the former hotel use resuming and that there is demand for and market interest in the site as a hotel. In the absence of such information on the resumption of or reversion to a hotel use of the site the proposals would need to be assessed and compared effectively against the site being empty and therefore in the circumstances the proposed development is inappropriate development in the Green Belt contrary to policy CS02 (Scale and Distribution of Development) of the Gravesham Local Plan Core Strategy, September 2014, and section 13 of the National Planning Policy Framework (NPPF) - Protecting Green Belt land.
 2. The applicants have failed to demonstrate to the Borough Council that the development would not result in an intensification of use in the Green Belt and that impact on the openness of the Green Belt from intensification of use is no greater than the existing use as a hotel and therefore the proposed development is inappropriate development in the Green Belt contrary to policy CS02 (Scale and Distribution of Development) of the Gravesham Local Plan Core Strategy, September 2014, and section 13 of the National Planning Policy Framework (NPPF) - Protecting Green Belt land.
 3. The applicants have failed to demonstrate to the Borough Council the overriding reasons as to why a petrol filling station has to be located at this site, in regard to the need for the use proposed, and the extent of the likely impact, if the development was permitted, on the existing Tollgate Service Station. The development would therefore be contrary to policy CS02 (Scale and

Distribution of Development) and policy CS07 (Economy, Employment and Skills) of the Gravesham Local Plan Core Strategy, September 2014.

4. The applicants have failed to demonstrate to the Borough Council the impact of the development on groundwater in respect of a site that is located within a Source Protection Zone (SPZ) and that the development meets the overriding reason tests in position statement D2 of the Environment Agency (EA) policy document, 'The Environment Agency's approach to groundwater protection' (November 2017) and also meets the EU Water Framework Directive objectives to support the protection of groundwater. Therefore, the development would be contrary to policy CS18 (Climate Change) of the Gravesham Local Plan Core Strategy, September 2014, and section 15 of the National Planning Policy Framework (NPPF) - Conserving and enhancing the natural environment.

6.10 These matters are referred to in this statement as "the putative reasons for refusal", and attention is drawn to paragraph 9.35-9.43, section 10, paragraph 9.10 and paragraph 9.90 of this statement, which address the matters raised.

6.11 An appeal against the decision was made but withdrawn in January 2020.

COMMENTARY

6.12 The site has a long planning history relating to improvements of the site as a hotel. In the last 10 years, two planning applications have been submitted by BP for a petrol filling station (and, in the first application, a drive thru restaurant). Both applications were granted planning permission by the local authority, but subsequently quashed following challenges from the operator of the nearby Shell branded petrol filling station.

6.13 As a result of the successful challenge of the consent arising from the second planning application, the local authority considered that additional information was needed to address the matters arising, preventing their support for development at the site. Against that background, it must be recognised that there are substantial differences between the proposal under application 20060215 and the proposed development pursuant to this planning application, and specifically:

- A refocusing of the proposed development to delivery of the government's net zero policy agenda, with a reduction in the number of petrol pump islands from eight to six (on a temporary basis to support the intervening period before electric vehicles are taken up more widely) and the inclusion of 24 EV charging bays (from zero in the previous scheme);
- A removal of the HGV refuelling element, and a reduction in the height of the proposed canopy, which will further prevent large vehicles using the site, and
- A new layout and design is now being promoted which has again been carefully designed to reflect site context and ensure a soft interface between the site and its surroundings.

6.14 Notwithstanding this, the matters raised in the September 2019 putative reasons for refusal have been carefully reviewed again by bp Pulse in the preparation of this new planning application, and are appropriately addressed throughout this statement.

7 PLANNING POLICY AND GUIDANCE

- 7.1 This section lists the planning policy and associated documents that are considered to be relevant to the planning application, including those set out by the putative reasons for refusal
- 7.2 Section 38(6) of the 2004 Planning and Compulsory Purchase Act requires that planning applications are determined in accordance with the Development Plan unless material considerations indicate otherwise.

THE DEVELOPMENT PLAN

- 7.3 The Development Plan for the planning application site consists of:
- Gravesham Local Plan Core Strategy and Local Plan Policies Map (2014)
 - Remaining Saved Policies of the Local Plan First Review (1994)
 - Kent Minerals and Waste Local Plan 2013-2030 (2020) (albeit this element of the Development Plan is considered to have no material relevance to the development proposals, and is not reviewed in this context)
- 7.4 The Design for Gravesham – Design Code SPD (2024) Supplementary Planning Guidance Document is also a material consideration in the context of this planning application.
- 7.5 Gravesham Borough Council are in the process of reviewing the Gravesham Local Plan Core Strategy, and have consulted at Regulation 18 stages 1 and 2 on the Site Allocations and Development Management Policies Document.
- 7.6 In 2020, the Local Authority undertook a consultation to review the Development Plan, referred to as the Emerging Local Plan Partial Review, Site Allocations and Development Management Policies (Regulation 18 - Stage 2) consultation. Within this document, the site is proposed to be allocated for commercial development (reference GB07). Whilst the Local Authority did not define 'commercial development' in the context of the allocation, BP welcomed the allocation and Rapley's made a representation on behalf of BP to this effect (see **Appendix 6**).
- 7.7 Gravesham Borough Council's emerging policy context was confirmed by the report to Cabinet on 3 January 2023, where it was decided that a revised Local Development Scheme (LDS) including a timetable for preparing the emerging Local Plan would be published. The timetable proposed to the Committee in January 2023 scheduled the Local Core Strategy Partial Review and Local Plan Site Allocations and Development Management Policies Document for Regulation 19 Consultation in September – October 2023, with adoption anticipated for December 2024. No further updates to the LDS, including revised dates for Regulation 19 Consultation, are currently available.
- 7.8 Nevertheless, some of the Core Strategy policies, such as those that relate to the amount of development needed in the Borough, are considered out of date, and the site has the potential to come forward for commercial development as part of the emerging Local Plan. The implications of this relative to the proposed development are reviewed later in this section.
- 7.9 The Development Plan confirms that the site lies within the Metropolitan Green Belt, and A227 Wrotham Road and A2 trunk roads are identified as being primary distributors in the highway network, and the site adjoins HS1 safeguarded land (albeit evidently the purpose for this safeguarding has long since been discharged).
- 7.10 The site is also located within an Area of Archaeological Potential, an Air Quality Management Area, Within the Thames Estuary and Marshes Ramsar Buffer, adjacent to a Biodiversity Opportunity Area, SGN Medium Pressure Pipeline, Groundwater Source Protection Zone 2, Gravesham Fringe Landscape Character Area, Smoke Control Zone and close to the proposed Lower Thames Crossing.
- 7.11 The following policies within the Core Strategy are relevant to the development proposal:
- **Policy CS01 'Sustainable Development'** – sets out that planning applications that accord with the development plan policies will be approved without delay, unless material considerations indicate otherwise.
 - **Policy CS02 'Scale and Distribution of Development'** – seeks to prioritise development in the urban area as a sustainable location for development. The policy states that development in the rural area will be supported within rural settlements defined in the Policies Map, and that developments outside the identified settlements, including proposals to maintain and diversify the rural economy will be supported where compatible with national policies for protecting the Green Belt.

- **Policy CS07 'Economy, Employment and Skills'** – seeks the delivery of new employment floorspace. The Council will support proposals that promote the appropriate expansion and diversification of the rural area economy.
- **Policy CS08 'Retail, Leisure and Hierarchy of Centres'** – prioritises Gravesend Town Centre as the sequentially preferred location for the main town centre uses covered by the policy (i.e. primarily retail and leisure). It requires that the NPPF sequential test and (for proposals exceeding 2,500 sq. m) the NPPF impact test be applied, with the town centre Primary Shopping Area being 'in centre' for retail assessment.
- **Policy CS09 'Culture and Tourism'** – seeks to maximise opportunities for expansion in culture and tourism. In particular, the Council will, inter alia, seek to protect and support improvements to existing cultural and tourist facilities, and support sustainable rural tourism and leisure developments that benefit rural businesses, communities and visitors where compatible with national Green Belt policies.
- **Policy CS11 'Transport'** – sets out that new developments should mitigate their impact on the highway and public transport networks as required. Sufficient parking in new development will be provided in accordance with adopted car parking standards. The Council will support proposals which improve public transport provision and facilities in the borough.
- **Policy CS12 'Green Infrastructure'** – supports the creation, protection, enhancement and maintenance of a network of green spaces, footpaths, cycle routes and wildlife corridors. The policy sets out that designated biodiversity sites will be protected and that there will be no net loss of biodiversity in the Borough. Opportunities to enhance, restore and re-create and maintain habitats will be sought. Where negative impacts on protected or priority habitats/species cannot be avoided, compensatory provision will be required. Overall landscape character will be preserved.
- **Policy CS18 'Climate Change'** – sets out the Council's approach to flood risk, water quality, sustainable drainage and surface water runoff, water demand management, and carbon reduction.
- **Policy CS19 'Development and Design Issues'** – seeks to ensure that new development will be visually attractive, fit for purpose and locally distinctive. The design and construction of new development will incorporate sustainable construction standards and techniques.
- **Policy CS20 'Heritage and the Historic Environment'** – gives a high priority towards the preservation, protection and enhancement of its heritage and historic environment as a non-renewable resource, central to the regeneration of the area and the reinforcement of sense of place. Particular attention in this regard will be focused on those heritage assets most at risk. When considering the impact of a proposed development on a designated heritage asset, the weight that will be given to the asset's conservation value will be commensurate with the importance and significance of the asset. For non-designated assets, decisions will have regard to the scale of any harm or loss and the significance of the heritage asset.

7.12 The relevant Saved Policies are :

- **Policy TC7 'Archaeological Sites'** – development on important archaeological sites will not normally be permitted, and planning permission may be refused without adequate assessment of the archaeological implications.
- **'Policy T1: Impact of Development on the Highway Network'** - the Local Planning and Highway Authorities will consider the impact on the transport system and on the environment of traffic generated by new development and will wish to ensure that all proposed developments are adequately served by the highway network identified on the Proposals Map.
- **'Policy T4: Development Outside the Built-Up Area'** - the Local Planning and Highway Authorities will not normally permit any proposed development outside the confines of the built-up area that generates significant vehicular or pedestrian traffic.

NATIONAL PLANNING POLICY FRAMEWORK

- 7.13 Relevant Central Government Policy is contained within the National Planning Policy Framework ('NPPF'), last updated in December 2023 and its accompanying National Planning Practice Guidance. The NPPF must be taken into account in preparing Development Plans, and is a material consideration in planning decisions.
- 7.14 The NPPF sets out the Government's planning policies for England and is underpinned by the presumption in favour of sustainable development that meets the needs of the present without compromising the ability of future generations to meet their own needs. To achieve sustainable

development, three overarching objectives – economic, social and environmental – need to be pursued in mutually supportive ways.

- 7.15 In terms of decision taking, paragraph 11 of the NPPF advises that for local planning authority decision making this means:
- Approving development proposals that accord with an up-to-date Development Plan without delay, or
 - Where there are no relevant development plan policies, or the policies which are most important for determining the application are out-of-date, granting permission unless:
 - the application of policies in this Framework that protect areas or assets of particular importance provides a clear reason for refusing the development proposed⁷; or
 - any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole.

- 7.16 Footnote 7 confirms that policies referred to in this paragraph are those in the Framework that relate, inter alia, to the Green Belt.

Decision-Making

- 7.17 NPPF paragraph 38 confirms that local authorities should approach decisions on proposed development in a positive and creative way, and work pro-actively with applicants to secure development that will improve the economic, social and environmental conditions of the area. It also stresses that decision-makers at every level should seek to approve applications for sustainable development, where possible.

Building a strong, competitive economy

- 7.18 Paragraph 85 explains that planning decisions should help create the conditions in which businesses can invest, expand and adapt. Significant weight should be placed on the need to support economic growth and productivity, taking into account both local business needs and wider opportunities for development.

Promoting sustainable transport

- 7.19 Paragraph 108 explains that transport issues should be considered from the earliest stages of development proposals so that, inter alia, the potential impacts of development on transport networks can be addressed, opportunities for promoting walking, cycling and public transport can be pursued in parallel with mitigating any adverse effects on the environment, and contributing to making high quality places.
- 7.20 Specifically, paragraph 108 b) provides that plan-making and development proposals should opportunities from existing or proposed transport infrastructure, and changing transport technology and usage, are realised.
- 7.21 Paragraph 110 e) confirms that planning policies should provide for any large scale transport facilities that need to be located in the area, and the infrastructure and wider development required to support their operation, expansion and contribution to the wider economy. Footnote 44, connected to this paragraph, states that large scale transport facilities include roadside services (for which most such proposals are unlikely to be NSIPs), and that the primary function of roadside services should be to support the safety and welfare of the road user.
- 7.22 Paragraph 115 states that development should only be prevented or refused on highways grounds if there would be an unacceptable impact on highway safety, or if the residual cumulative impacts on the road network would be severe.

Making effective use of land

- 7.23 Paragraph 123 explains that planning decisions should promote an effective use of land in meeting the need of various uses, while safeguarding and improving the environment and ensuring safe and healthy living conditions.
- 7.24 Paragraph 124 (c) confirms that substantial weight should be given to the value of suitable brownfield land within settlements for identified needs and support appropriate opportunities to remediate land.
- 7.25 Paragraph 125 advises that planning decisions need to reflect changes in the demand for land, with paragraph 128 setting out that development should be supported where it makes efficient use of land, taking into account inter alia, the identified need for the form of development and availability of suitable land, local market conditions and viability, and availability and capacity of infrastructure/services.

Achieving well-designed and beautiful places

- 7.26 Paragraphs 131-141 explains that it is important for LPAs to plan positively for the achievement of high quality, beautiful and inclusive design for all development, individual buildings, public and private spaces, and wider area development schemes. In particular, planning decisions should support development that makes efficient use of land, taking into account inter alia, identified need, local market conditions and viability and desirability of maintaining an area's prevailing character and setting, or of promoting regeneration and change.

Green Belt

- 7.27 Chapter 13 of the NPPF sets out the government's approach towards Green Belts, and attaches great importance on the aim of preventing urban sprawl and keeping land permanently open.
- 7.28 Paragraph 143 identifies five purposes of the Green Belt:
- a) to check the unrestricted sprawl of large built-up areas;
 - b) to prevent neighbouring towns merging into one another;
 - c) to assist in safeguarding the countryside from encroachment;
 - d) to preserve the setting and special character of historic towns; and
 - e) to assist in urban regeneration, by encouraging the recycling of derelict and other urban land.
- 7.29 Paragraph 152 sets out that inappropriate development is, by definition, harmful to the Green Belt and should only be approved in very special circumstances.
- 7.30 Paragraph 153 further details that substantial weight should be given to any harm to the Green Belt and, that very special circumstances will only exist if the potential harm to the Green Belt by reason of inappropriateness, and any other harm resulting from the proposal, is clearly outweighed by other considerations.
- 7.31 Paragraph 154 sets out some exceptions to inappropriate development, including:
- "c) the extension or alteration of a building provided that it does not result in disproportionate additions over and above the size of the original building."
 - "d) the replacement of a building, provided the new building is in the same use and not materially larger than the one it replaces."
 - "g) limited infilling or the partial or complete redevelopment of previously developed land, whether redundant or in continuing use (excluding temporary buildings), which would:
 - not have a greater impact on the openness of the Green Belt than the existing development; or
 - not cause substantial harm to the openness of the Green Belt, where the development would re-use previously developed land and contribute to meeting an identified affordable housing need within the area of the local planning authority."
- 7.32 Paragraph 155 sets out further exceptions to inappropriate development in the Green Belt, provided they preserve its openness and do not conflict with the purposes of including land within it, which include:
- "c) local transport infrastructure which can demonstrate a requirement for a Green Belt location."
 - "d) the re-use of buildings provided that the buildings are of permanent and substantial construction."
- 7.33 The Glossary at Annex 2 of the NPPF defines previously developed land as:
- "Land which is or was occupied by a permanent structure, including the curtilage of the developed land (although it should not be assumed that the whole of the curtilage should be developed) and any associated fixed surface infrastructure. This excludes: land that is or was last occupied by agricultural or forestry buildings; land that has been developed for minerals extraction or waste disposal by landfill, where provision for restoration has been made through development management procedures; land in built-up areas such as residential gardens, parks, recreation grounds and allotments; and land that was previously developed but where the remains of the permanent structure or fixed surface structure have blended into the landscape."

Meeting the Challenge of Climate Change

- 7.34 Paragraph 157 confirms that the planning system should support the transition to a low carbon future. Included in the range of measures to achieve this are:

- encouraging the reuse of existing resources, including the conversion of existing buildings, and
- supporting renewable and low carbon energy and associated infrastructure.

DRAFT NATIONAL PLANNING POLICY FRAMEWORK (CONSULTATION VERSION)

- 7.35 The new national government is proposing reforms to the National Planning Policy Framework, with the consultation on the proposed amendments running until 24 September 2024. Whilst, at the time of writing, the consultation on the proposed amendments is active, and the date of adoption of the proposed reforms as yet unannounced, the draft NPPF (Consultation Version) is a material consideration in the determination of planning applications.
- 7.36 The reforms of most relevance to this planning application are the exceptions to inappropriate development in the Green Belt included within Chapter 13.
- 7.37 The draft NPPF proposes amendments to the test contained within the exception to inappropriate development provided by paragraph 151 part g) (as amended) [formerly paragraph 154 part g)], relating to limited infilling or the partial or complete redevelopment of previously developed land (such as the application site), whether redundant or in continuing use (excluding temporary buildings) which would not cause substantial harm to the openness of the Green Belt.

EMERGING LOCAL PLAN POLICIES

- 7.38 In October 2020, the local authority undertook a consultation on the Regulation 18 Stage 2 version of its "Part 1: Local Plan core strategy partial review and site allocations". As confirmed above, this review was undertaken as some parts of the current Development Plan (particularly that relating to the location of development) are out of date.
- 7.39 Although the emerging plan has not yet been submitted to the Secretary of State for examination in public, the emerging local plan clearly sets out the local authority's direction of travel in terms of policy against a Development Plan which is recognised as being partially out of date, and therefore should carry considerable weight in decision making, particularly in terms of the location of development (i.e. site allocations).
- 7.40 Within the emerging plan, the site is allocated for commercial development, under reference GB07. This allocation is strongly supported by BP as the landowner, and is consistent with BP's aspirations (and the proposed development, which is evidently "commercial development").

EVIDENCE BASE DOCUMENTS

- 7.41 It is noted that the local authority's emerging Local Plan has been informed by a suite of evidence base documents, including the Stage 2 Green Belt Report by LUC (2020). Within this document, the site lies within a relatively lengthy strip of land between the former route of the A2 and the replacement dual carriageway running to the south of it (reference: GR1). In terms of LUC's findings relating to this strip of land and the purposes of including land within the Green Belt we note as follows:
- **Purpose 1** – the GR1 land parcel is found to have moderate contribution to checking the unrestricted sprawl of large built-up areas. However, the analysis recognises that there is some limited urbanising development (the A2 is specifically identified), distinct from the open land elsewhere in the parcel.
 - **Purpose 2** – it is found that the land parcel makes limited/no contribution to preventing neighbouring towns from merging into one another.
 - **Purpose 3** – it is indicated that this land parcel has a relatively limited contribution to this purpose, but as with Purpose 1 it is recognised that the land parcel has urbanising influences, and further it is found that the parcel has a stronger relationship with the settlement than the countryside.
 - **Purpose 4** – it is found that the parcel does not make a significant contribution to the setting of any historic town.
 - **Purpose 5** – all Green Belt land reviewed by the assessment is identified as being equal in terms of this element of the assessment.
- 7.42 The impact of releasing GR1 on the contribution of adjacent land to Green Belt purposes is found to be zero, or negligible and the release of GR1 would result in a distinct and consistent boundary between the settlement and the Green Belt, in the form of the A2.
- 7.43 In terms of the overall harm to Green Belt purposes from the release of the land, it is found that:
- 'Release of the parcel would constitute moderate sprawl of the large built-up area but would lead to relatively limited encroachment on the countryside. It would constitute a negligible weakening of the

integrity of adjacent Green Belt land. Therefore, the harm to the Green Belt purposes of releasing this parcel would be low-moderate.”

SUMMARY COMMENTS

7.44 In summary:

- The Development Plan is out of date in terms of the location of development, and in emerging policy the local authority is proposing that the site be allocated for commercial development;
- The NPPF confirms that the planning system should support the transition to a low carbon future, including the reuse and conversion of existing buildings, and supporting low carbon energy infrastructure;
- In the context of NPPF paragraph 7 d), NPPF policies relating to the Green Belt apply, and it is noted that although new buildings in the Green Belt are normally inappropriate development, exceptions are set out (including the redevelopment of previously developed land and local transport infrastructure);
- In assessing the impact of the proposal on the Green Belt, it is noted that the local authority's evidence base finds that the site is part of a land parcel which only makes a moderate contribution to one purpose of including land within the Green Belt, and limited or no contribution to the other purposes (where a comparison is made), and
- The Development Plan contains a range of development management matters which need to be addressed by planning application proposals.
- With regard to the government's proposed reforms to the NPPF (Consultation Version, July 2024), the site is previously developed land, and as such limited infilling or the partial or complete redevelopment of the site would not be inappropriate development if it would not cause substantial harm to the openness of the Green Belt

8 PRE-APPLICATION ENGAGEMENT

8.1 In advance of the submission of this planning application, the local authority was engaged in pre-application discussion.

First Pre-Application Consultation

8.2 An initial pre-application package was submitted to the local authority in May 2022, consisting of:

- Draft scheme plans and elevations, and
- A covering letter.

8.3 The purpose of the package (attached at **Appendix 7**) was to:

- Allow the plans to be tabled, and any initial local authority feedback secured; and
- Discuss the scope and content of the supporting information necessary for the local authority to properly consider a planning application.

8.4 A meeting was held with officers on 20 June 2022, followed up by a written pre-application response on 20 July 2022, where it was confirmed that:

- The principle of development is acceptable providing it meets the objectives of all the policies in the local plan and NPPF (including in relation to the Green Belt), and
- Detailed commentary was provided relative to various development management issues (including the scope of the planning application).

Second Pre-Application Consultation

8.5 A second pre-application package (attached at **Appendix 8**, and including the response from the local authority) was submitted to the local authority on 11 July 2023, consisting of:

- plans and elevations for a revised scheme, and
- A covering letter.

8.6 The amendments to the scheme for which pre-application advice was previously sought can be summarised as follows:

- A reduction in parking and an increase in soft landscaping;
- A reduction in built form resulting from the removal of the jet wash and car wash;
- A reduction of in width of the proposed shop/amenity building from 25m to 23m;
- An increase in height of the shop/amenity building from 5.8m to 6.8m;
- A reduction in height of the canopy over the proposed petrol offer form 6.3m to 5.08m; and
- Alterations to the architectural style, form, materiality and feel of the proposed sales/amenity building including simplification of the structural style of the proposed building, replacement of the green barrel vault roof with a sedum roof, and increased use of glass along the entrance façade.

8.7 The pre-application meeting was held at the local authority's offices on 22 August 2023, followed by written pre-application advice received on 19 September 2023, where it was confirmed that:

- The principle of development is acceptable providing it meets the objectives of all the policies in the local plan and NPPF (including in relation to the Green Belt);
- The development would appear to meet the exception listed within para. 149 (g) of the NPPF 2021 [now 154 (g) of the draft NPPF 2024] provided it does not have a greater impact on the openness of the Green Belt than the existing development. It may also be classed as not inappropriate in the Green Belt under para. 150 (c) of the NPPF 2021 [155 (c) of the draft NPPF 2024].
- The reduction in built form and hard standing was welcomed.
- Whilst the main building would be higher than the previously proposed building, the reduction in width and sedum roof aids in reducing the overall bulk, which would lessen the impact on the Green Belt and is therefore welcomed.
- Biodiversity Net Gain and the surrounding Landscape Character Area will need to be addressed by the proposal.

Third Pre-Application Consultation

- 8.8 A third pre-application package was submitted to the local authority on 06 June 2024. As this third pre-application comprised the draft full planning application package, the submission documents are not included as an appendix to this Statement. For clarity, the following draft documents were submitted as part of the third pre-application package:
- A Covering Letter prepared by Rapleys LLP
 - A Planning, Design & Access, and Sustainability Statement prepared by Rapleys LLP;
 - A full suite of drawings, prepared by MBH Architecture, including
 - EV005-PS-GAS-000-GB00015044-0001-001_B01 Proposed Building Details RevB
 - EV005-PS-GAS-000-GB00015044-0002-001_B01 Equipment Details Sheet RevA
 - EV005-PS-LAY-000-GB00015044-0001-001_B01 OS Location Plan RevE
 - EV005-PS-LAY-000-GB00015044-0003-001_B01 Existing Site Layout RevC
 - EV005-PS-LAY-000-GB00015044-0003-002_B01 Existing Site Layout 1-500 RevD
 - EV005-PS-LAY-000-GB00015044-0004-001_B01 Proposed Site Elevations RevE
 - EV005-PS-LAY-000-GB00015044-0005-001_B01 Proposed Site Layout RevE
 - EV005-PS-LAY-000-GB00015044-0005-002_B01 Proposed Site Layout 1-500 Rev F
 - EV005-PS-LAY-000-GB00015044-0007-001_B01 Surfacing Site layout RevC
 - EV005-PS-LAY-000-GB00015044-0009-001_B01 Vehicle Tracking HGV RevC
 - EV005-PS-LAY-000-GB00015044-0010-001_B01 Vehicle Tracking Cars RevC
 - Transport Statement prepared by Markides Associates
 - Ecological Impact Assessment and Biodiversity Assessment prepared by Eco Tech
 - Bat Surveys and Technical Note prepared by SLR Consultancy
 - Landscape and Visual Impact Assessment prepared by Huskisson Brown
 - Landscaping Plan and Planting Schedule prepared by Huskisson Brown
 - Phase 1 Contamination Desk Study Report prepared by Subadra
 - Fuel Tank Risk Assessment prepared by Subadra
 - Air Quality Assessment prepared by Wardell Armstrong
 - Acoustic Assessment prepared by Sharps Redmore
 - Lighting Assessment prepared by Graham White Lighting Consultancy
 - Archaeological Assessment prepared by the Environmental Dimension Partnership Ltd
 - Arboricultural Impact Assessment prepared by Owen Allpress
 - Flood Risk and Drainage/SUDS Assessment prepared by Weetwood
 - Operational Rationale prepared by BP Pulse
 - Heritage Assessment prepared by the Environmental Dimension Partnership Ltd.
 - The amendments to the scheme for which pre-application advice was previously sought can be summarised as follows:
 - A reduction of in width of the canopy skirting the proposed shop/amenity from 3.8m to 3.4m, and the addition of skirting to the southern end of the shop/amenity building to fully encompass the building; Alterations to the elevational treatment comprising minor alterations in the juxtaposition of glass and timber cladding;
 - Provision of 6 x Sheffield cycle stands north of the customer parking;
 - Transfer of two of the 24 EV bays to accessible EV bays, and the addition of four additional accessible bays off the amenity/sales building;
 - Demarcation of a goods drop off zone south of the compound; and
 - Detailed development of the landscaping plan.

- 8.9 The third and final pre-application meeting with Gravesham Borough Council held at Local Authorities Offices 16 July 2024 was positive and productive. At the time of writing, written feedback from the Gravesham Borough Council was not yet provide. However, written consultation feedback was received from National Highways (11 July 2024) and Kent County Council's Ecology (06 August 20024; revised on 14 August 2024). These responses are included within **Appendix 9**. In summary:
- Further to the consultee response received from National Highways, the applicants Transport Consultants, Markides Associates, undertook further direct consultation with National Highways to discuss the points raised. A summary of this consultation is included within the Transport Assessment prepared by Markides Associated.
 - Kent County Council's Ecological Advice (06 August 2024) confirmed the following:
 - The proposed lighting assessment has determined that there will be no significant additional light pollution from the subject site. KCC therefore confirmed they are satisfied at there will be minimal impact to the proposed habitats on site from the proposed lighting.
 - KCC confirmed they are satisfied that the proposed mitigation in the EclA for breeding birds and hedgehogs, identified as having potential to be on site, are sufficient.
 - KCC confirmed in their revised Ecological Advice Note (14 August 2024) that the results of the 2022 Bat Preliminary Roost Assessment Surveys are valid, and the mitigation recommendations as outlined in the bat survey report still apply.

9 STATEMENT OF COMMUNITY INVOLVEMENT

- 9.1 As part of the preparation of the final design proposal and full planning application package, a comprehensive public consultation exercise was undertaken to inform local residents, businesses and stakeholders of the proposed development in advance of submission of the planning application.
- 9.2 This section of the Statement sets out the activity undertaken to engage with the local community and the outcome therein.

Programme

- 9.3 Details of the public consultation were agreed with Gravesham Borough Council prior to implementation of the programme, and comprised a dedicated councillor briefing and a public consultation website. The consultation programme is detailed as follows:

Councillor Briefing

- 9.4 The councillor briefing took place on Thursday 1st August 2024, between 10:00 and 13:00 at The Best Western, in Gravesham. On behalf of bp pulse, Rapleys issued invitations to the following councillors, as agreed with Gravesham Borough Council, informing them of the dedicated briefing:
- Shane Mochrie-Cox - Coldharbour & Perry Street Ward, and Deputy Leader of the Council
 - Christina Rolles - Coldharbour & Perry Street Ward
 - Narinderjit Singh Thandi - Coldharbour & Perry Street Ward
 - Dakota Dibben - Istead Rise, Cobham & Luddesdown Ward
 - Samir Jassal - Istead Rise, Cobham & Luddesdown Ward
 - Emma Elliott - Painters Ash Ward
 - Alan Ridgers - Painters Ash Ward
 - David Beattie – Woodlands Ward
 - Alan Metcalf - Woodlands Ward
 - Benjamin Sizer - Woodlands Ward
- 9.5 At the briefing, Rapleys and bp pulse presented the scheme and the proposed consultation website to those that attended, which was followed by a question and answer session.

Consultation Website

- 9.6 On 21st August 2024, a letter advertising the public consultation was delivered to 2,031 addresses within the vicinity of the site. The letter provided details of the website, include a QR code to allow recipients to access the website directly, as well as a dedicated email address. This letter and the distribution area are included in **Appendix 10**. The consultation letter was also emailed directly to the ward councillors and key parish and stakeholder groups, inviting them to respond to the website directly, and to distribute the letter to their constituents.
- 9.7 A public notice advertising the details of the consultation website was displayed within the Gravesend & Dartford Messenger on Thursday 19th August 2024. A copy of the public notice is included in **Appendix 11**.
- 9.8 The consultation website was online from 21st August 2024 – 9th September 2024 at: bp-tollgatehotel-gravesend.rapleys.com. The website included:
- A detailed description of the proposal, including drawings and CGI's;
 - Details of the applicant and their partnership with M&S;
 - Highlights of the scheme, including key benefits;
 - Details of the site context, including drone footage showing a walkover of the site;
 - Confirmation of the sites Green Belt location, and an overview of the assessment against openness; and
 - Instructions on how to take part in the consultation, including an opportunity for detailed comments.
- 9.9 A copy of the website is included at **Appendix 12**.

Consultation Feedback

- 9.10 The following responses were received during the consultation:
- 232 via the consultation website
 - 5 via email
- 9.11 The feedback received from both the consultation website and via the dedicated email was overwhelmingly positive, with 88.3% of responses supporting the proposed development.
- 9.12 A summary of the responses to the three questions posed by the consultation website is included below:
- Do you support the redevelopment of the site? **92.8% of responses were positive** (equating to 214 responses), of which 78.1% of strongly agree, and 14.6% agree. Only 3.4% of responses strongly disagree (equating to 8 responses).
 - Do you support the provision of Ultra-Fast EV chargers on the site? **90.7% of responses were positive** (totalling 206 responses), of which 68.7% strongly agree, and 22% agree. Only 4.4% of responses strongly disagree (10 responses).
 - Do you support bp pulses proposals for the site? **88.1% of responses were positive** (totalling 200 responses), of which 67% strongly agree and 21.1% agree. Only 4% of responses strongly disagree (9 responses).
- 9.13 A full report of the feedback received from the consultation website is included in **Appendix 31**.
- 9.14 Written feedback was received through both the public consultation website and the dedicated email, with 94 responses providing written feedback. Of the written feedback received, 126 confirmed direct support for the redevelopment of the site and/or the proposed development itself. The major themes of the written feedback, excluding those comments of direct and general support for the proposal is included below alongside responses from the project team outlining how the submitted application has had regard for this feedback (note the comments are summarised for ease of assessment).

Theme	Comments	Protect Team Response
Traffic	A number of comments relating to traffic were raised within the written responses, including: How will the proposal manage increased traffic at the roundabout, and through the site? Has altering the slip road on the Dover direction of the A2 been considered so vehicles can leave without using the roundabout?	The application is supported by a Transport Assessment and Travel Plan that has been prepared following extensive consultation with KCC and National Highways. It is considered that all matters of transport are fully addressed, and that the proposed development would not have any undue impact on the existing road network with regard to access and capacity.
Proposed Development	The necessity of further petrol station/amenity shop in this area was flagged within a few responses, including potential impact on adjacent Shell.	The proposed development would principally provide a different offer to the adjacent Shell and other petrol filling stations within the local area, given that the primary offer would be Ultra Rapid EV Chargers, with an ancillary petrol filling offer that would not cater to HGV's. Furthermore, the application is supported by an EV needs assessment prepared by Graham + Sibbald, which confirmed the need for EV infrastructure in the local and wider area.

Theme	Comments	Protect Team Response
Litter / Maintenance of the site	The proposed EV facility was very well received, and Ultra Rapid charging (250 kw) specifically requested.	The applicant and design team welcome the positive feedback received.
	An overwhelming number of responded strongly welcomed the redevelopment of the site, described as a local 'eyesore'.	
	Requests for further expansion of the facilities, including fast food restaurants, were received	Given the sites location within the Green Belt, further expansion of the proposed facility is not prudent.
	Requests for high quality landscaping, tree planting and BNG.	The applicant and design team welcome the comments for provision of extensive landscaping, tree planting and BNG, which is provided by the proposed development, which includes the planting of 57 trees, extensive habitat creation include a sedum roof and swale, and a BNG of 14.81%. Detailed information is contained within the Ecology Reports and Landscaping Plan.
	How will litter (an existing issue within the local area) be managed?	bp pulse and M&S are committed to providing a high-quality facility throughout the lifetime of the development. Onsite staff would be responsible for ensuring day-to-day management and maintenance of the site is maintained.
Proposed M&S	Neighbours and members of the public strongly supported the proposed provision of an M&S on site.	The applicant and design team welcome the positive response to the franchise partnership between bp and M&S.
Parking and movement Pollution	Provision of motorcycle parking spaces requested by one responded.	Dedicated motorcycle parking has not been proposed as the site is primarily intended for electric vehicles. However, there is sufficient space on site to provide motorcycle parking should this be considered necessary.
	Connectivity to cycle routes requested.	This is proposed, including connections to the adjacent Cyclopark.
	Potential for additional noise from cars was flagged by one response.	This concern is acknowledged. A noise report has been prepared by Sharps Redmore which confirms that no elements of the proposed development would have a negative impact on neighbour amenity.

Theme	Comments	Protect Team Response
	Concerns over light pollution.	A lighting assessment has been prepared by Graham White, which confirms the proposed development would not have a harmful impact with regard to light spill
Materiality	A ward councillors expressed a preference toward use of brick over timber, having regard to Gravesham's design code.	The applicant and design team have taken on board this feedback and amended the materiality of the proposed amenity/sales building, changing the façade treatment from timber to brick to reflect the local character and vernacular of Gravesend.

9.15 The applicant and design team have reviewed and considered all feedback received, and taken into account recommendations where appropriate, as outlined above. A full breakdown of the comments received is included in **Appendix 13**.

Summary

9.16 In addition to the extensive pre-application engagement undertaken with Gravesham Borough Council detailed in the previous section of this Statement, the applicant undertook a thorough process of community engagement. The extent of the public consultation, including the distribution area, the key stakeholders approached, detailed of the website itself, were agreed and shared with the Gravesham Borough Council prior to implementation of the public consultation exercise.

9.17 There was clear and evident public interest in the proposal, and the feedback received has been overwhelmingly positive. All feedback received has been reviewed and considered by the applicant and project team.

10 PLANNING CONSIDERATIONS

10.1 This section of the Statement sets out the key planning considerations arising from the proposed development, primarily the Principle of Land Use and Green Belt matters.

PRINCIPLE OF LAND USE

10.2 This application seeks planning permission for a flagship EV charging hub with ancillary petrol filling element in a strategic location of the SRN. There is an overriding need for the development, as identified in the Business Rational prepared by BP Pulse (see **Appendix 14**) and summarised below.

10.3 The central imperative for EV charging, at this site and others nationwide, is part of the inevitable and essential move away from hydrocarbons into a world where net zero carbon transport is the norm.

10.4 In the wider context, Central Government has confirmed that the UK economy should become net-zero by 2050, and the 2021 "Net Zero Strategy: Build Back Greener" paper aims, inter alia, to "remove all road emissions at the tailpipe".

10.5 Following this, in March 2022 the Government released "Taking Charge – the Electric Vehicle Infrastructure Strategy". As the title suggests, this document is focused on the delivery of the maximum number of public charging points for EVs in the shortest possible time. This document is reviewed in detail in Section 4 of the Needs Assessment, but in summary:

- Chargers should be rolled out where they are needed the most;
- Two crucial sectors are identified to make "range anxiety" (a factor identified as holding back adoption of electric vehicles) a thing of the past – high powered charges on the strategic road network, and local on-street charging, and
- The Government should not be involved in private provision of EV charging, except to remove existing barriers.

10.6 This policy support for EV vehicles and infrastructure also feeds through to County and Local Authority initiatives, as reviewed in Section 4 of the Needs Assessment.

10.7 The Central Government's push for a nationwide shift to carbon neutral transportation is further emphasised by the Prime Minister's announcement in December 2023 that the government would "consult on amending the National Planning Policy Framework to ensure that it prioritises the roll out of charge points, on top [of] the funding of almost £400 million to support local authorities to spread them out so that all our families have access to them", and the Department of Levelling Up, Housing and Communities consultation published 13 February 2024 on the delivery of amendments to PD rights to further facilitate the roll-out of electric vehicle charging points.

10.8 There is therefore a well-recognised need for low carbon technologies that support the paradigm shift to non-combustion-based vehicles.

10.9 The need for the proposal is further assessed in the 'Proposed Electric Vehicle Strategic Road Network Service Area with Amenity Building and Ancillary Traditional Fuels Need Assessment' (hereafter the 'EV Need Assessment') prepared by Graham + Sibbald LLP (**Appendix 15**).

10.10 Whilst it is not a matter for planning to determine the impact of a proposal on nearby competitors, the impact of the proposal on the neighbouring Tollgate Filling Station has been considered in the EV Needs Assessment. In summary, and in the context of the third putative reason for refusal, the assessment concludes that the viability of the Tollgate Service Station would not be materially impacted by the proposed development due to their different core purposes.

10.11 The proposed development would therefore meet the ambitions set out within Chapter 9 of the NPPF 'promoting sustainable transport' due to its clear and obvious role in supporting the transition to low carbon technologies. The proposed development should be viewed in the wider context of its role as part of a local and national offer of genuine sustainable transport modes, as an opportunity to maximise sustainable transport solutions, that the improvement in air quality and public health that such solutions provide, as highlighted by paragraph 109 of the NPPF.

10.12 Need is therefore well established, both locally and nationally and the proposed development should therefore be considered acceptable in this regard. The principle of the site's location within the Green Belt is set out in the following sub-section.

GREEN BELT – ADOPTED NPPF

10.13 The proposal involves development on previously developed land within the Metropolitan Green Belt.

- 10.14 Section 13 of the NPPF relates to the protection of Green Belt Land. Paragraph 142 attaches great importance to the Green Belt, the fundamental aim of which is to prevent urban sprawl by keeping land permanently open. The essential characteristics of Green Belts are their openness and permanence.
- 10.15 Paragraph 152 confirms that inappropriate development is, by definition, harmful to the Green Belt and should only be approved in very special circumstances. Inappropriate development includes the construction of new buildings within the Green Belt. Exceptions to this are provided in Paragraph 154.
- 10.16 Of particular relevance to this proposal is the exception set out in Paragraph 154 g), which confirms that limited infilling or the partial or complete redevelopment of previously developed land, whether redundant or in continuing use (excluding temporary buildings), which would not have a greater impact on the openness of the Green Belt than the existing development, would not be considered inappropriate development in the Green Belt.
- 10.17 The NPPF goes on to state (paragraph 155) that other forms of development are also not inappropriate in the Green Belt provided they preserve its openness and do not conflict with the purposes of including land within it. These are:
- a) mineral extraction;
 - b) engineering operations;
 - c) local transport infrastructure which can demonstrate a requirement for a Green Belt location;
 - d) the re-use of buildings provided that the buildings are of permanent and substantial construction;
 - e) material changes in the use of land (such as changes of use for outdoor sport or recreation, or for cemeteries and burial grounds); and
 - f) development, including buildings, brought forward under a Community Right to Build Order or Neighbourhood Development Order.
- Paragraph 155 c) is of particular relevance to this application.
- 10.18 The purpose of this section of the Planning Statement, therefore, is to consider the proposed development in terms of its appropriateness in the Green Belt, under the terms of the NPPF paragraphs 154 g) and 155 c). The appropriateness of these two exceptions being applied to the proposed development is confirmed by the local planning authority in their pre-application response dated 19 September 2023 (see Appendix 7), albeit the numbering of these paragraphs has since been revised by the current NPPF (December 2023). This report adopts the new numbering (relevant at the time of decision making).
- Paragraph 154 g) limited infilling or the partial or complete redevelopment of previously developed land, whether redundant or in continuing use.**
- 10.19 For this exception to inappropriate development in the Green Belt to be applied to development proposals, it must be demonstrated that the relevant development: (a) would result in limited infilling or the partial or complete redevelopment of previously developed land, whether redundant or in continuing use; and (b) would not have a greater impact on the openness of the Green Belt than the existing development. We take each limb of para 154 g) in turn:
- (a) limited infilling or the partial or complete redevelopment of previously developed land, whether redundant or in continuing use
- 10.20 The proposed development seeks the demolition of existing structures on site and construction of an EV charging hub with ancillary sales/amenity building and petrol filling offer.
- 10.21 Previously developed land is defined in Annex 2 of the NPPF as “land which is or was occupied by a permanent structure, including the curtilage of the developed land and any associated fixed surface infrastructure”.
- 10.22 That the site can be considered previously developed land is evidenced by its planning history. Furthermore, it can be considered that the entirety of the site is previously developed given the presence of the buildings comprising the former Tollgate Hotel, its associated car parking and extensive areas of hardstanding, with only limited landscaping. The whole of the site is the curtilage of the permanent structures, and is previously developed land.
- 10.23 The site is evidently not in active use at present. However, as confirmed by the Structural Survey (2024) included in **Appendix 16** and Section 10 ‘Alternatives to the Development Proposal’s’ of this Planning Statement, the buildings are sufficiently structurally sound that they can be brought back into active use through a range of interventions ranging from minimal restoration (which would not trigger Green Belt policy as set out in the NPPF), minor extensions and infill (which could accord with the

exemption set out in Paragraph 154 c) of the NPPF), or partial demolition and rebuild (in accordance with Paragraph 154 d) of the NPPF) (see below).

(b) would not have a greater impact on the openness of the Green Belt than the existing development

- 10.24 Paragraph 142 of the NPPF identifies the essential characteristics of Green Belt as relating to its openness and permanence. The baseline for considering the effect on openness, which is the absence of development with both spatial and visual aspects, must be the existing site circumstances. National Planning Guidance (Reference ID: 64-001-20190722) notes that other matters relevant to the assessment of impact on openness include the degree of activity generated, including traffic generation and other visual impacts including lighting.
- 10.25 To demonstrate the impact of the proposed development on the Green Belt comparative to the existing Tollgate Hotel, existing and proposed area and volume calculations have been prepared (see **Appendix 17**).
- 10.26 The comparative calculation demonstrates that the existing former Tollgate Hotel buildings have a combined volume of approximately 10,234.4m³, whilst the proposed development would have a total volume of 2,627m³ equating to a reduction in built volume on the site of 74.33%. Furthermore, the existing footprint of the site is 1,92m² while the proposed would be 481m², resulting in a 75.03% reduction in footprint. The proposed development would therefore have a substantial positive impact on the spatial openness of the Green Belt.
- 10.27 Furthermore, the proposed development would comprise 5,133m² of landscaping when compared to 3,583m² of existing landscaping. This is a 30.2% increase in landscaping on the site - a clear, positive impact in openness, in spatial terms.
- 10.28 The highest point of the original Tollgate Hotel building is 54.54m AOD, and the highest point of the wing elements is 55.25m AOD. Comparatively, the highest point of the proposed amenity building would be 48.0m AOD, reflective of both the lower build height of the proposed structure comparative to the existing hotel structures, and also the location of the proposed amenity building in an area of lower topography than the wing elements of the Tollgate Hotel. This further confirms that the proposed development will have a positive impact on openness, in spatial terms.
- 10.29 As demonstrated above, and articulated within the Landscape and Visual Impact Appraisal (LVA) provided by Huskisson Brown Associates, in terms of visual openness the proposed development has a clear and very positive benefit arising from the decrease in built form, as well as the increase of the area dedicated to landscaping, when compared to the site in its existing state. In terms of the perceptual benefits of the proposed development, this is largely due to the removal of the existing built form, some of which sits at an elevated / skylined location on the eastern boundary, and its replacement by a reduced mass of development at a significantly lower level that, when observed from most viewpoints, would not be seen to break the skyline. As a result of the proposed development, the site would appear much more open and less prominent.
- 10.30 Thus, on this simple basis, it is concluded that the openness of the Green Belt would not be harmed by the proposed development, but would rather be notably enhanced in visual terms.
- 10.31 With regard to visual impact (as well as impact on openness, in visual terms), a detailed assessment provided by Huskisson Brown Associates in the Landscape and Visual Impact Appraisal (LVA). This includes an assessment against the three fallback positions in addition to the proposed development.
- 10.32 As set out above and confirmed in the LVA, the proposed amenity building and canopies would be of lower height, set on lowered ground and positioned in the centre of the site, and thus less prominent than the existing Tollgate Hotel buildings resulting in a positive impact on visual openness.
- 10.33 As demonstrated in the proposed site plan (see **Appendix 2**), and above, part of the site will be returned to open landscape and new neutral grassland areas, mixed shrubs and areas of woodland planting will be introduced, with the proposed development resulting in a total increase of 1,920m² of landscaping when compared to existing areas on the Site. In addition, semi-mature trees are proposed to the northern and southern boundaries of the site providing a beneficial visual contribution by both screening the development from view and adding to the verdant character of the site and immediate area.
- 10.34 Not only does the proposed development therefore represent a substantive improvement to the site in regard to spatial openness, but also in terms of the visual impact of the site given the increase in verdant character, the reduction in built form (in volume), the reduced prominence of the permanent structures, and the replacement of the existing dilapidated buildings with a higher quality development. The proposed development would therefore have a positive impact on the visual dimension of the site's sense of openness, when viewed from its surroundings.

- 10.35 As noted above, whilst the emphasis of this assessment of impact should be made against the existing site situation, i.e. the existing former Tollgate Hotel buildings, which materially diminishes the baseline degree of openness of the site in Green Belt terms, it is also important to note that the proposal would have a positive impact on the Green Belt when assessed against all three fallback positions articulated in Section 10 of this Planning Statement¹.
- 10.36 All three fallback options would have a greater footprint and therefore greater built volume than the proposed development, resulting in a less positive impact on the openness of the Green Belt in spatial terms than the proposed development. Similarly, in visual terms, the greater footprint and built form of all three options, and the reduced opportunity for landscape benefits arising from each, taking into consideration the siting and visibility of each option within the local context compared to the proposed, would result in all fallback options having a notably less beneficial impact on the Green Belt, on the whole, than that of the proposed development. Noting there would be an incremental improvement in the impact on the openness of the Green Belt (albeit very minor compared to the proposed) from fallback Option's (a) and (b) (least increase compared to the existing built form) to Option (c) (most increase of the three fallback options).
- 10.37 In summary, as identified within the LVA, the proposed development would have the greatest potential to reduce the visibility of its built form and to provide enhancements in terms of its maturing landscape in the surrounding area. Comparatively, the fallback options do not have the potential to deliver the same level of visual benefit.
- 10.38 With regard to the other components that could be considered to affect openness, whilst there would evidently be an increase in vehicle movements within the site itself and in lighting as compared to the current unused state of the site, this would have a negligible impact on openness in comparison to the substantial positive impact the development would have on openness.
- 10.39 With regard to the impact of traffic generated by the proposed use, an assessment has been undertaken by Markides Associates (see Transport Assessment), the methodology and calculations of which have been agreed with both Kent County Council Highways and Transport and National Highways through the course of multiple pre-application discussions.
- 10.40 In summary, the traffic generated by the proposed use would comprise existing trips from vehicles already on the road network and within the Green Belt, either diverted from the A2 or passing to/from Gravesend. The activity generated by the proposed development is therefore *de minimis* in the context of the linked trips generated and the site's proximity to the SRN. This would not amount to a perceivable impact on openness of the Green Belt.
- 10.41 With regard to the impact of lighting on the visual sense of openness of the Green Belt, a lighting assessment has been undertaken by Graham White Lighting Consultancy (GWLC). Whether taking either the reinstated hotel use or the currently vacant site as the relevant baseline, the immediate context of the site, given the proximity and density of road junctions, is such that the proposed lighting scheme would not result in light pollution given the existing ambient lighting levels surrounding the site. In summary:
- The existing lighting level of the surrounding area is high given the adjacent highway lighting requirements;
 - The high illuminance level of the junctions and road network lighting (including associated car headlamps) will create an illuminated curtain for over 70% of the site's boundaries, thereby reducing contrast and therefore amenity impact associated with the proposed lighting;
 - The lighting levels associated with the proposed development would be mitigated by the boundary containment, the proposed landscaping and tree planting, the use of the latest lighting technology products and the masking effect of the canopies and retail buildings obscuring direct line of sight.
- 10.42 Any impact of the proposed lighting scheme on the sense of openness of the Green Belt would therefore be diminished when compared to the site as vacant or as an active hotel.
- 10.43 In consideration of the above, the proposed development would be of a reduced visual prominence when compared to the existing site circumstances, and when assessed against the three fallback

¹ See Section 10 of this statement for a detailed assessment of the fallback positions against NPPF Policy. In summary the fallback positions are the various feasible options for bringing the existing hotel use back into site: Option (a) relates to repairing the existing buildings; Option (b) involves extending or altering the buildings on site, albeit in a manner that does not result in disproportionate additions over and above the size of the original buildings; and Option (c) comprises the replacement of part of the built form on the site, albeit with replacement in the same use and not materially larger than the built form that the development replaces (**Appendices 19 & 20**).

positions (refer to the LVA for a comparative assessment). The proposal would therefore have a positive impact on the spatial and visual openness of the Green Belt. The proposal therefore readily meets the tests of Paragraph 154 g) and on that basis is considered an exception to inappropriate development in the Green Belt.

Paragraph 155 c) local transport infrastructure which can demonstrate a requirement for a Green Belt location.

- 10.44 In order for the exception set out in Paragraph 155 c) to apply, it must be demonstrated that the development would: (a) comprise local transport infrastructure that can demonstrate a need for a Green Belt location; (b) it would not harm the openness of the Green Belt; and (c) it would not conflict with any of the purposes for which land is included in the Green Belt. These requirements are assessed in turn as follows.
- (a) local transport infrastructure that can demonstrate a need for a Green Belt location
- 10.45 The term 'local transport infrastructure' is not defined within the NPPF. However, there are recent appeal decisions that provide clarity on what constitutes "local" in this context.
- 10.46 In the Waterbeach appeal decision (Appeal Ref. APP/W0530/A/14/2228347, dismissed 04 February 2015) the inspector concluded that local transport infrastructure could reasonably be interpreted to mean those physical assets which enable people and goods to move about efficiently by a range of transport modes.
- 10.47 Further context is provided by the Whittlesford appeal decision (Appeal Ref. PP/W0530/W/18/3210008., dismissed 09 April 2020) where the inspector clarified that the term 'local transport infrastructure' means transport infrastructure which is delivered to meet a public need within a local area, as distinct from infrastructure to serve the future needs of a new single private development. The Inspector goes on to conclude that, when introducing the reference to "local transport infrastructure" into the NPPF 2012, the Secretary of State, in his Impact Assessment, revealed that "local transport infrastructure" is infrastructure which is "beneficial to communities" in that it would address an existing deficiency or requirement within the local community.
- 10.48 More recently, the Skipton appeal (Appeal Ref: APP/C2708/W/23/3319925, allowed 25 August 2023), relating to roadside services facility providing petrol, electric vehicle charging and a retail kiosk, provided clarity on what might constitute local in circumstances where proposals would also support various journeys that go beyond local trips. To this effect, the Inspector found that, whilst the proposal would clearly serve through traffic given its location on strategic routes, it would also serve the local community.
- 10.49 In consideration of the above, and as affirmed by numerous recent appeal decision on the topic, local transport infrastructure can be reasonably considered to refer to EV charging hubs that are accessible from the nearby public highways and/or the strategic road network².
- 10.50 In terms of the need for the Green Belt location, this, alongside a general assessment of EV need, is set out within the EV Need Assessment' prepared by Graham + Sibbald LLP (**Appendix 15**).
- 10.51 The location of the proposed development within this Green Belt location is integral and necessary as it would directly support this section of the A2 and the wider SRN, connecting traffic between London and the M2, where the provision of existing EV facilities is below that claimed by the Department for Transport (see the EV Needs Case for further detail).
- 10.52 It should also be noted that the majority of Gravesham Borough Council (BC) is designated as Green Belt or protected under national and international landscape and nature conservation designations, including the entirety of the A2 corridor within Gravesham BC. It is therefore necessary to locate the proposed development within the Green Belt, given it seeks to serve the needs of SRN road users along this part of the A2, in addition to meeting a local need. Removing the feeling of range anxiety through the expansion of electric vehicle charging infrastructure so it is readily available along the SRN will inevitably result in the need for electric vehicle infrastructure to be located within the Green Belt to support the paradigm shift to electric vehicles, for which there is strong national and local policy support.
- 10.53 In consideration of the above, it can be confirmed that the proposed development amounts to transport infrastructure that can demonstrate a need for a Green Belt location, given that it primarily

² Relevant recent appeals where the inspector concluded that EV charging infrastructure could be considered local transport infrastructure as it relates to paragraph 155 (c) of the NPPF include (but is not limited to): Appeal Ref. APP/V1260/W/23/3318202 dismissed 7 November 2023; Appeal Ref: APP/C2708/W/23/3319925 allowed 25 August 2023; and Appeal Ref: APP/P1940/W/19/3232159 dismissed 6 November 2019.

relates to the provision of an EV charging hub, with an ancillary sales/amenity building and petrol filling offer. The proposal can also be considered 'local' given that:

- it would serve the local community, being off the Wrotham Road – an arterial road connecting to Gravesend and Norfleet- and connected to the immediate residential neighbourhoods and mixed-use centres by pedestrian and cycle ways;
- it would meet a local demand for ultra-rapid EV charging facilities within Gravesham, and along this section of the Strategic Road Network (see the EV Needs Assessment in **Appendix 15**);
- it is required to be locally located given the sites existing access to the A2 via the slip road, and the lack of ultra-rapid EV charging facilities along this section of the SRN;
- the proposal would enable EVs to be recharged by drivers undertaking either local or longer journeys, therefore fulfilling a local and strategic need.

- 10.54 The proposal should also be viewed in the wider context of its role as part of a local and national offer of genuine sustainable transport modes, and as an opportunity to maximise sustainable transport solutions local and regionally - noting the improvements to air quality and public health that such solutions provide - as highlighted by paragraph 109 of the NPPF, and the overarching ambitions identified within Chapter 9 of the NPPF.
- 10.55 It has therefore been demonstrated that the proposal would constitute 'local transport infrastructure that can demonstrate a need for a Green Belt location, as the proposal is seeking to deliver a flagship EV hub that fulfils a role in serving local need, and cannot be located outside the Green Belt. Further, in terms of strategic need, it will be part of the wider nationwide roll out of EV charging facilities, and requires direct and efficient access to the Strategic Road Network.
- (b) it would not harm the openness of the Green Belt
- 10.56 It has been confirmed that the proposal would not harm the openness of the Green Belt in paragraphs 9.24 – 9.44 above. Rather, there will be substantial benefits.
- (c) it would not conflict with any of the purposes for which land is included in the Green Belt.
- 10.57 The five purposes of including land within the Green Belt are set out in Paragraph 143 and include: to check the unrestricted sprawl of large built-up areas; to prevent neighbouring towns merging into one another; to assist in safeguarding the countryside from encroachment; to preserve the setting and special character of historic towns; and to assist in urban regeneration, by encouraging the recycling of derelict and other urban land.
- 10.58 The proposal would not conflict with the intrinsic character or key functions of the Green Belt, as defined in paragraph 143 of the NPPF for the reasons set out below, which align with the conclusions drawn from the Green Belt Study of Gravesham prepared by LUC as part of the Regulation 18 evidence base, and summarised in Paragraphs 7.38 -7.40 of this Planning Statement. In summary:
- a) The site is previously developed land and would result in a decrease in building volume, footprint, and hardstanding on the site. Further, the site immediately south of the urban area of Gravesend and Norfleet, and immediate north of the A2 which would itself help check unrestricted sprawl of large urban areas. The proposal would therefore not impede the Green Belt's function of checking unrestricted sprawl of large built-up areas – if anything it will assist it.
 - b) the proposed development would not result in neighbouring towns merging into one another nor harm the function of the Green Belt in preventing urban sprawl due to the site's location along the SRN and on the corner of Wrotham Road, a major connecting road, and noting the nature of this strip of the Green Belt which acts more as a buffer between the A2 and the built up area of Gravesend (with no other towns in the vicinity of the site), .
 - c) the proposal would realise the potential of this brownfield site without harming the openness of the Green Belt, thereby safeguarding the countryside from encroachment by reducing the need for development on undeveloped sites within the Green Belt.
 - d) The site's roadside location context does not impact on the setting or special character of any historic towns.
 - e) For the reasons set out above, the proposed development would fulfil the aims and ambitions of key purpose (e) of the Green Belt, as identified in Paragraph 143, which seeks "to assist in urban regeneration, by encouraging the recycling of derelict and other urban land", given the proposed development relates to previously developed land.
- 10.59 The proposed development would not hinder the key functions of the Green Belt's designation as set out within paragraph 143 of the NPPF. In consideration of the above, it is considered that the local

transport infrastructure proposed would not by reasons of its nature or scale, especially taking into account the existing site's situation and the viable fallback positions, exceed the paragraph 155 threshold. The exception for local transport infrastructure would therefore apply and the proposed development would not be inappropriate development in the Green Belt, but rather would have a positive impact in relation to openness in both its visual and spatial dimensions.

Summary

- 10.60 In summary, the proposed development would fall into the NPPF definition of development that is not inappropriate in the Green Belt against two different categories: the redevelopment of previously developed land and the delivery of local transport infrastructure that can demonstrate the need for a Green Belt location. As such, the proposed development should be supported, particularly in light of its beneficial effects on the Green Belt. The need to demonstrate "very special circumstances" to address inappropriate development within the Green Belt does not arise. However, for completeness, the very special circumstances of the proposed development have been identified in Section 11 of this Planning Statement.

GREEN BELT – DRAFT NPPF (CONSULTATION VERSION)

- 10.61 As detailed in section 8 of this Statement, the new central government is consulting on the proposed reforms to the NPPF. The reforms of most relevance to this planning application are those to Green Belt policy within Chapter 13, namely paragraph 151 g) (existing paragraph 154 g) as amended), and proposed paragraph 152.

Paragraph 151 g) limited infilling or the partial or complete redevelopment of previously developed land, whether redundant or in continuing use which would not cause substantial harm to the openness of the Green Belt

- 10.62 That the proposed development can be considered to amount to the complete redevelopment of previously development land, whether redundant or in continuing use, is both evident and addressed in paragraph 10.19 – 10.23 of this Statement.
- 10.63 With regard to evidencing that the proposed development would not cause substantial harm to the openness of the Green Belt, it has been clearly demonstrated within paragraphs 10.24 – 10.43 of this Statement that the proposal would have a positive impact on the openness of the Green Belt, in both the visual and spatial dimensions.
- 10.64 The proposed development would therefore come within the provisions to exceptions to inappropriate development within the Green Belt as defined under paragraph 151 g) (as amended) of the draft NPPF (Consultation Version).

Summary

- 10.65 It is clear from the above assessment that the proposed development can be considered an exception to inappropriate development as defined under paragraph 151 g) (as amended) of the draft NPPF (Consultation Version).
- 10.66 The proposed development should therefore be supported in the context of the adopted NPPF and the draft NPPF (Consultation Version).

OTHER DEVELOPMENT MANAGEMENT MATTERS

- 10.67 In addition to the above, the other relevant development management consideration that arise in respect of the proposed development can be summarised as follows:

- Air Quality
- Acoustics
- Design and Appearance
- Landscape and Visual Impact
- Heritage and Townscape
- Transport
- Flood Risk and Drainage
- Trees and Ecology
- Lighting

- Ground Conditions

Air Quality

- 10.68 An Air Quality Assessment has been prepared by Wardell Armstrong LLP that assesses the impact of the proposed development in relation to dust and particulate matters arising during the construction phase, and road traffic emissions arising during the operational phase.
- 10.69 The assessment 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. Mitigation measures are proposed and set out within the Air Quality Assessment and relate to construction best practise or a dust action plan.
- 10.70 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.
- 10.71 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.

Arboricultural Impact

- 10.72 The site contains some vegetation (albeit very limited in comparison to existing built form), including a number of trees within and adjacent to the site. It is understood from previous negotiations with the local authority that there are no TPOs on site.
- 10.73 An Arboricultural Impact Assessment (AIA) has been prepared by Owen Allpress that assesses the impact of the proposed development on existing trees within and adjacent to the site. In summary, the AIA confirms the following:
- As identified above, there are no known TPO's on site, and the site is not within a Conservation Area.
 - A single category B tree, (T1), and a single category C tree group, (G7), along with a single category C tree (H2), are required to be removed to facilitate the proposed design.
 - A single section of vegetation, (G5), towards the northern boundary of the site will be required to be cut back in order to facilitate the creation of the new gabion wall boundary. Cutting back of this vegetation is not an arboriculturally significant operation and can occur without any further specialist Arboricultural input.
 - No works are proposed to occur within root protection areas of retained trees. All root protection areas will be appropriately protected for the duration of the construction phase.
 - Given the lack of any trees within the compound itself following initial stages of demolition and site clearance, tree protection fencing is not likely to be required.
- 10.74 Overall, the proposed development would have a minimal impact on the existing trees on and adjacent to the site, and the proposal has sought to minimise loss of existing trees where possible. Furthermore, the loss of those trees requiring removal to facilitate the proposed development would be mitigated through ample tree planting and landscaping across the site, which would improve the arboriculture amenity of the site when compared to the existing situation.

Design and Appearance

- 10.75 The NPPF (2023) sets out that the creation of high quality, beautiful and sustainable buildings and places is fundamental to what the planning and development process should achieve, with good design representing a key aspect of sustainable development.
- 10.76 Policy CS19 (LPCS) states that the design, layout and form of new development will be derived from a robust analysis of local context and character and will make a positive contribution to the street scene, the quality of the public realm and the character of the area.
- 10.77 The Design Code SPG for Gravesham provides design guidance for new development within Gravesham. The SPG identified the prevailing characteristics and architectural features that positively contribute towards Gravesham and its local vernacular. Whilst the Design Code does not provide specific guidance for EV and Petrol Stations, brick is identified as a prevailing material within the local area.

- 10.78 As identified within the Design and Access Section of this report, the proposed development has been designed following careful assessment of the existing site and surrounding context. The resulting proposed development includes a modestly sized amenity/sales building, centrally located, with a façade comprising brick and glazing, and a sedum roof to ensure the build form sits comfortably within the site, and blends in harmoniously with its surroundings.
- 10.79 All other built form has been kept to the minimum required to accommodate the proposed development, in order to reduce visual impact on the Green Belt and surrounding area. Ample landscaping and tree planting has been provided to soften the visual impact of the proposed development.
- 10.80 The proposed development therefore represents a substantial improvement to the existing situation in regard to visual amenity, and is therefore considered acceptable and beneficial in this regard. Further, consideration has been made toward the local context and setting, to ensure the proposal responds to the local context.

Archaeology

- 10.81 As the site is located within a designated area of archaeological potential, the Environmental Dimension Partnership Ltd has prepared a desk based archaeological assessment.
- 10.82 This report concludes that the modern development of the site is likely to have heavily truncated or entirely destroyed any archaeological remains.
- 10.83 The archaeological potential of the site is therefore very limited, and would not contain any archaeological remains that would be of such significance as to warrant physical preservation in situ.
- 10.84 Therefore, in terms of archaeology, the planning proposals are considered to comply with the Policy CS20 of Gravesham Local Plan and Chapter 16 of the NPPF.

Ecology

- 10.85 An Ecological Impact Assessment, including Biodiversity Net Gain calculations, has been undertaken by Eco Tech Ecological Consultancy and submitted in support of this planning application. The Ecological Impact Assessment considers the likely impacts of the proposed development on biodiversity, including both the impact on existing biodiversity, and impact post-development.
- 10.86 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.
- 10.87 The Assessment notes that 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.
- 10.88 The Biodiversity Net Gain Metric 4 confirms that the site would provide a 14.81% net gain in habitat units on site.
- 10.89 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.
- 10.90 Bat emergence surveys were undertaken in August and September 2022 to determine the presence or likely absence of bat roosts within the existing buildings.
- 10.91 The Surveys found no evidence of bats emerging from or re-entering any buildings during surveys. Therefore, no evidence of roosting bats was recorded during the surveys suggesting likely absence from the buildings on site. However, commuting and foraging activity of a low number of bats was recorded within the Site boundary.
- 10.92 SLR re-visited the site on 18 March 2024 to assess whether any changes to existing site conditions would require new bat surveys to be undertaken in addition to those undertaken previously undertaken in August and September 2022. The site assessment concluded that any change to the existing buildings since August 2022 was minor, and did not change the roost potential of the buildings. Further bat emergence surveys are therefore not required and the 2022 report and surveys remain robust and can be relied upon.
- 10.93 The overall value of the site for local bat populations, therefore, continues to be negligible, and the redevelopment of the site is unlikely to impact bats or their roost sites either directly or indirectly.

Flood Risk and Drainage

- 10.94 A Flood Risk and Drainage Assessment has been undertaken by Weetwood which has been informed by extensive consultation with the Environment Agency and Kent County Council as the Lead Local Flood Authority.
- 10.95 In terms of the key findings/conclusions that have informed the proposal:
- Flood Risk:
- 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.
 - Notwithstanding this, 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.
- Surface Water Drainage:
- There are public surface water sewers present within the vicinity of the site. All on-site manholes are foul only and there are no surface water sewers on site.
 - It is assumed that surface water runoff from impermeable surfaces at the site discharges to the ground.
 - It is proposed to dispose of surface water by infiltration to the ground, which is the preferred option in the drainage hierarchy.
 - Attenuation storage will be provided to store surface water runoff generated across the impermeable areas, including provision of 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.
- 10.96 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.
- 10.97 It is therefore considered that the proposed development appropriately mitigates against any potential drainage impact arising to the SPZ2.
- 10.98 As confirmed above, the proposed development is at low risk of flooding from all sources and will not increase flood risk elsewhere over the lifetime of development. The proposed drainage strategy follows the sustainable drainage hierarchy, and proposed infiltration as the means of surface water disposal, including provision of attenuation basin, which has added biodiversity benefits. The proposed development is therefore in line with the NPPF and local planning policy.

Ground Conditions

- 10.99 A Phase One Environmental Assessment and Infiltration Report have been prepared by Subadra to assess the ground conditions of the site.
- 10.100 In summary, the investigations confirm no sources of potential contamination (past or present) were identified on site and no viable pollutant linkages were identified. No further environmental investigation, assessment or remedial works are therefore required prior to the site's redevelopment.

Fuel Tank Installation Risk Assessment

- 10.101 The site is located within a Zone II – Outer Protection (SPZ2), and two below ground petrol fuel tanks are proposed beneath the PSF element of the site.
- 10.102 The impact of the proposed development on groundwater and how the proposed development meets the overriding reasons tests as set out in the Environmental Agency (EA) position statement D2 policy document ('The Environment Agency's approach to groundwater protection' February 2018 Version 1.2), is required to be assessed to ensure there would be no undue impact on SPZ2.
- 10.103 An Appraisal of Risks Associated with New Fuel Tank Installation has therefore been prepared by Subadra to assess the potential impact of installing the underground fuel storage tanks.
- 10.104 The EA's position statement D2 states that the EA will agree to underground storage of hazardous substances in principal and secondary aquifers outside SPZ1 where there is overriding evidence as to why:
- a) the activity cannot take place on unproductive strata, and
 - b) The storage must be underground (for example public safety), in which case the risks should be appropriately mitigated.
- 10.105 Confirmation that there are no other available sites on unproductive strata is required to demonstrate the need for below-ground tanks.
- 10.106 As identified within Subadra's Assessment:
- The use of above ground storage tanks at the site is not considered feasible or necessary, based on a range of potential health and safety, viability and possible pollution risk concerns (provided the necessary engineering controls, as specified in Section 3 of Appraisal of Risks Associated with New Fuel Tank Installation, are adopted);
 - The proposed petroleum installation is considered to represent the current best industry standard as described within 'Design, Construction, Modification, Maintenance and Decommissioning of Filling Stations', APEA/EI, 4th Edition, April 2018 (also known as the Blue Book), and with the appropriate and relevant British and European standards for tanks, monitoring systems, lines and pumps. This type of below ground fuel storage system (using double skin monitored tanks) has been used for the last 40 years across Europe without any recorded incidence of loss of product;
 - The proposed petroleum installation is considered appropriate for a site located within a groundwater Source Protection Zone II in accordance with EA guidance, for the protection of groundwater in the relevant site setting.
- 10.107 It has therefore been demonstrated that the proposed development meets the overriding reason tests set out in position statement D2 of the EA.

Heritage Impact

- 10.108 A Heritage Impact Assessment has been prepared by the Environmental Dimension Partnership Ltd (EDP) to consider the heritage interest of the existing buildings on site.
- 10.109 As identified previously within this Statement, and confirmed within the Heritage Impact Assessment, none of the existing buildings are statutorily or locally listed, within proximity to designated or non-designated heritage assets, or within a conservation area.
- 10.110 Nevertheless, the Heritage Impact Assessment has assessed the existing buildings on site to establish their heritage significance. This Assessment confirms that the former Tollgate Inn was built as a roadside pub in the 1920 and was subsequently altered over time, concluding that the former Tollgate Inn building has no artistic or archaeological interest. The existing building is therefore of little heritage interest which is insufficient to warrant status as a 'non-designated heritage asset'. This is in line with the conclusions drawn and reflected in both the 2013 and 2016 planning applications.
- 10.111 It is therefore considered that the proposed development is acceptable in this regard, and compliant with local plan policy CS20 of the Gravesham Local Plan and Chapter 16 of the NPPF.

Lighting Assessment

- 10.112 Due to the context of the site within the Green Belt and in close proximity to residential areas, a Lighting Impact Assessment has been prepared by Graham White Lighting Consultancy (GWLC) to inform and confirm the impact of the proposed lighting scheme.
- 10.113 The Lighting Impact Assessment confirms that the scheme has been designed in line with best practise for visual performance, comfort and energy efficiency, and illuminance levels would be in

keeping with relevant guidance. Furthermore, there will be no significant additional light pollution from the subject site, and there would be no harmful impact on the rural amenity or night sky cover above the existing baseline conditions. In relation to lighting, the proposal can therefore be considered to be acceptable and compliant with the policy at paragraph 191 c) of the NPPF.

Noise

- 10.114 An Acoustic Assessment was undertaken by Sharps Redmore Partnership Limited and submitted in support of the planning application. The report assesses the predicted noise levels of key functional elements of the proposed development against the existing background noise levels and standard guideline levels, including at noise sensitive receptors during both day and night.
- 10.115 In summary:
- The predicted noise levels associated with the forecourt activity would be below existing ambient noise levels and below guideline levels at both day and night.
 - The predicted noise levels associated with delivery activity would fall significantly below existing background levels at both day and night, with maximum levels below the recommended guidelines for sleep disturbance.
 - There is no noise anticipated from fuel deliveries, and therefore no harm would be caused to residential amenity during the day or night.
 - Plant specifications have not yet been made. However, given the identified background noise levels, it is suggested to limit plant rating sound levels to 51dB during daytime and 50db at night in the interested of protecting neighbouring residential amenity. It is recommended that such details are secured by condition.
 - The predicted noise levels of the proposed EV charging stations when used simultaneously would be negligible.
- 10.116 In consideration of the above, the proposed development could operate, including receiving deliveries at any time during the daytime and night, without impacting residential amenity in regard to noise disturbance.
- 10.117 As such, there would be no adverse impact arising from the proposal in respect of noise. The proposed development would therefore comply with the policy at paragraph 191 a) of the NPPF.

Transport

- 10.118 A Transport Assessment has been undertaken by Markides Associates which has been informed by extensive consultation with National Highways and Kent County Council.
- 10.119 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.
- 10.120 Care has been taken to develop a layout that allows vehicles to traverse through the site and arrive at either the petrol filling pumps or EV charging facilities with ease, whilst allowing vehicles to circle back around the site without exiting the site, should either element be fully occupied at the time of their arrival. The proposal's layout has been designed to allow for efficient site circulation, and to ensure there is no negative impact on the highway network adjacent to it.
- 10.121 Furthermore, the layout of the EV bays is such that it optimises opportunities for users to find available bays through development of a circular flow of traffic.
- 10.122 In addition to the 24 EV charging bays, 12 petrol filling pumps and two dedicated air/water bays, 41 parking bays are provided (including 4 bays for staff and 4 dedicated disabled bays). This parking allows customers seeking to utilise the amenity shop to do so and provides space for customers waiting for an EV bay.
- 10.123 Six covered cycle parking spaces will be provided for staff and visitors to the site, with sufficient space around the site for future expansion, as needed. Given the nature of the use and number of staff required at any one time (between 8 and 10), it is considered that this level of parking is suitable.
- 10.124 Swept path analysis confirms that all servicing vehicles, including refuse, delivery and fuel tankers, can comfortably navigate the site.
- 10.125 Trip generation and traffic flows have been assessed drawing on data from comparable EV schemes, and the proposal's impact on the existing highways network. In summary, the proposed development would not have an undue highways impact, and is therefore acceptable in transport terms.

10.126 The proposed development is therefore considered acceptable from a transport perspective, and in compliance with Policy CS11 of the Gravesham Local Plan and Chapter 9 of the NPPF.

11 ALTERNATIVES TO THE DEVELOPMENT PROPOSALS

- 11.1 Putative reasons for refusal 1 and 2 set out in the 2019 committee report for the previous bp PFS application, and points 1 and 2 of the Note, refer to a lack of evidence that the site could realistically be brought back into use as a hotel. For the current application an evidence base has been prepared to address this matter, comprising:
- A Hotel Needs Assessment has been prepared by Graham + Sibbald LLP (**Appendix 18**) which concludes that, the site could be brought back into use as a hotel, and that there is sufficient demand to justify this;
 - Three development options (the 'fallback schemes') are open to any potential hotel occupier to bring the site back into active use as a hotel, including:
 - Option (a): Repairing the existing buildings, supported by a Structural Survey prepared by Halliday West Ltd Chartered Building Surveyors dated 23 April 2024 (**Appendix 16**);
 - Option (b): Extending or altering the buildings on site, albeit in a manner that does not result in disproportionate additions over and above the size of the original buildings (**Appendix 19**); and
 - Option (c): The replacement of part of the built form on the site, albeit with replacement in the same use and not materially larger than the built form that the development replaces (**Appendix 20**).
- 11.2 More specifically, as a point of principle, before it closed the site was used as a hotel for many years. Although the site was used as an office supporting the construction of the A2, planning permission to enable this was sought (and granted) on a temporary basis.
- 11.3 Further, as confirmed by the Structural Survey prepared by Halliday West Ltd Chartered Building Surveyors, all the buildings on site are structurally sound and wind/watertight, and hardstanding is still in place and cleared of vegetation. However, it is accepted that any replacement of the existing buildings would require planning permission, as indeed might their extension or alteration.
- 11.4 The following scenarios have been considered in terms of hotel use, each of which comprises an exception to inappropriate development within the Green Belt as identified by the NPPF:
- Paragraph 155 d) – the reuse of buildings provided that the buildings are of a permanent and substantial construction (provided this preserve the openness of the Green Belt and does not conflict with the purposes of including land within it);
 - Paragraph 154 c) – the extension or alteration of a building provided that it does not result in disproportionate additions over and above the size of the original building; and
 - Paragraph 154 d) – the replacement of a building, provided the new building is in the same use and not materially larger than the one it replaces
- 11.5 To establish the realistic possibility of the three above mentioned development options constitute viable fallback positions, each option has been assessed against the relevant criterion of the NPPF in turn.
- Option (a): Minimal work/repair**
- 11.6 On 15 November 2022 Halliday West Ltd, Chartered Building Surveyors, were instructed to undertake a visual inspection to report on the general state and condition of the buildings and external areas of the former Tollgate Hotel complex to ascertain whether the buildings remain structurally sound and capable of re-use.
- 11.7 In summary, whilst the Structural Survey found that the external fabric of the buildings and the external areas of the complex to be in a state of some disrepair, subject to the preparation of a detailed scope and specification of repair and refurbishment works being duly completed, it would be possible for the property to be brought back into use. In doing so it will be necessary to replace elements that have reached the end of their serviceable life and to carry out refurbishment works to meet current standards and regulations.
- 11.8 Importantly, the principal building and accommodation block were found to be permanent, substantial, of relatively sound construction and structurally stable.
- 11.9 For a full assessment of the conditions of the existing buildings please refer to the Structural Survey included in **Appendix 16**.
- 11.10 It is therefore concluded that the existing structures (which are permanent and substantial) could be brought back into functional use as a hotel, consistent with paragraph 155 d) as, evidently, the need

for planning permission would only relate to alterations/improvements to the appearance of the existing building, which could not undermine the openness of the Green Belt nor conflict with the purposes of including land within it. In this context, the principal planning issue arising would be the acceptability of the buildings' change in appearance, which would not be contentious (not least given the current unsightly nature of the buildings, and that they are undistinguished in design terms with no material heritage interest).

Option (b): Minor extension/re-modelling required.

- 11.11 This option involves the demolition of the existing security building to the south of the site, the partial demolition of some canopies to the rear of the oldest building, an addition/ infill to improve the connection between the oldest building and the adjacent wing, and a minor extension to the eastern most wing. Please refer to **Appendix 19** for further detail on Option (b).
- 11.12 In the context of the existing and retained built form of the Tollgate Hotel, it is considered that the minor extensions and infill required to facilitate Option (b) would not be disproportionate to the original building given that:
- Superfluous sections of the existing built form would be demolished, the volume, massing and footprint of which would be offset against the proposed additions;
 - The additions, which would improve the connection between the original buildings, would be minor in volume, massing and scale, and would fit comfortably within the space between the main building and the adjacent wing, forming a natural extension to the building that would not be materially perceptible outside the site, when compared to the existing building footprint;
 - The addition would be located on existing areas of hardstanding, and would not materially alter the overall footprint of the buildings;
 - The extension would not protrude above the existing built form when viewed from any angle, and would be shielded from view by the existing building when viewed from the north east and west; and
 - The minor extension to the southern end of the eastern most wing is very minor in scale, massing and footprint. Whilst this addition would be visible from the south, it would match the forms of the eastern wing and would not noticeably increase the size of the wing when viewed from any angle.
- 11.13 It can therefore be concluded that the Option (b) would not result in disproportionate additions over and above the size of the original building, and can therefore reasonably be considered to come forward for development under Paragraph 154 c) of the NPPF.
- 11.14 Option (b) is therefore a viable fallback position to the proposed development (and provides a response to the second putative reason for refusal listed in the 2019 committee report).

Option (c): Partial demolition and re-build with same building footprint.

- 11.15 This option involves the demolition of the security building and partial demolition of some canopies (similar to Option (b) above), complete demolition of both wings, construction of a new wing connection to the original building and extensions and infilling to the original building. Please refer to **Appendix 20** for further detail on Option (c).
- 11.16 Whilst Option (c) relates to the partial demolition and replacement of the existing building, and provides for extensions and alterations to the elements retained, it is considered that this option comes within the exception listed under NPPF Paragraph 154 d) in that:
- The existing use of the building as a hotel would be retained;
 - The total footprint of this option would be no greater than the existing footprint given the extent of demolition proposed, and the total area of hardstanding would be reduced;
 - The consolidated built form can reasonably be considered to have less of a visual and special impact on the Green Belt, given it would remove an entire wing and consolidated mass and footprint around the original building to maximise useable floorspace; and
 - The extensions and infill of the original building are such that they would be either largely invisible when viewed externally from most angles, or would replicate the structure and original building, thereby not visibly altering the form of the original structure.
- 11.17 The total built form of Option (c) would not be materially larger than the existing buildings on site, and would instead reduce the visual prominence of the building when viewed externally from all areas. In this context, Option (c) is considered to have a positive spatial and visual impact on the Green Belt. It can therefore be readily concluded that Option (c) would meet the tests of NPPF Paragraph 154 d) and

can therefore be considered an exception to inappropriate development in the Green Belt. It therefore represents a viable fallback position in planning terms.

- 11.18 Further, Option (c) could also fall under NPPF exception 154 g) which allows the limited infilling or the partial or complete redevelopment of previously developed land, whether redundant or in continuing use (excluding temporary buildings), which would not have a greater impact on the openness of the Green Belt than the existing development. The above assessment set out in relation to NPPF paragraph 154 d) is considered to also apply to this exception.

Summary

- 11.19 In terms of the prospect of the site returning to its former hotel use as confirmed in the Hotel Needs Assessment prepared by Graham + Sibbald LLP, prevailing hotel and tourism market data and initial market interest indicate that the site could readily be modified to bring it back into active use as a hotel, either through minimal changes to the proposals, and/or through development that is confirmed by the NPPF as not being inappropriate in the Green Belt.
- 11.20 In all scenarios, it has been confirmed that the site could readily be brought back into use as a hotel in a manner that is consistent with Green Belt policy, and would also be capable of being delivered in terms of market demand and viability.

12 VERY SPECIAL CIRCUMSTANCES/PLANNING BENEFITS

- 12.1 Paragraph 152 of the NPPF identifies inappropriate development within the Green Belt as, by definition, harmful to the Green Belt. It should not be approved except in very special circumstances (VSC).
- 12.2 Paragraph 153 of the NPPF provides that substantial weight should be given to any harm to the Green Belt. Further, VSC will not exist unless the potential harm to the Green Belt by reason of inappropriateness, and any other harm resulting from the proposal, is clearly outweighed by other considerations.
- 12.3 For the reasons set out in Section 8 of this Planning Statement, it is considered that the proposed development does not amount to inappropriate development within the Green Belt, as the proposed development clearly comes within the ambit of exceptions set out in both in the adopted NPPF and the draft NPPF (Consultation Version). Specifically, the proposal meets the exceptions to inappropriate development as set out in paragraphs 154 g) and 155 c) of the adopted NPPF, and paragraph 154 g) (as amended) of the draft NPPF (Consultation Version). Very special circumstances are therefore not required to make the proposed development acceptable in terms of Green Belt policy. Further, beyond the absence of harm to the Green Belt, it must also be recognised that the planning application submission confirms that there is no "other harm" arising from the proposed development – rather, it is in accordance with the Development Plan and national policy.
- 12.4 However, in the alternative and in any event, "very special circumstances" exist by reason of the proposed development's wide-ranging and significant planning benefits. which it is considered outweigh any potential harm to the Green Belt by reason of inappropriateness, and which thereby justify the grant of planning permission for the proposed development.
- 12.5 The VSC arising from the proposed development are defined in the context of the sustainable development overarching objectives identified in paragraph 8 of the NPPF.

Economic Benefits

- 12.6 BP Pulse has high aspirations for the site, with the proposed development representing a flagship project for the applicant, and one of the first of its kind in the UK. Evidently, there are numerous economic benefits associated with the proposal, including:
- As demonstrated within this Planning Statement and the EV Needs Assessment, there is a strong identified need for the proposed development in this location. The proposal would ensure the right development is provided in the right place, and at the right time.
 - Significant investment in EV Infrastructure in support of the nationwide shift to low carbon vehicles.
 - Employment generation during both the construction and occupational phase of the proposed development. BP Pulse are committed to prioritising employment of local residents.
 - Redevelopment of an underutilised, vacant site, which presents an unsightly gateway to the town of Gravesend, including bringing it back into an active use that contributes to the local economy.
 - A commitment from BP Pulse to invest in excess of £10 million into the regeneration of the site.

Social Benefits

- 12.7 The development will assist in delivering the social objective of sustainable development identified in the NPPF by:
- Transforming an unsightly, derelict site into a well-designed development in a gateway location to Gravesend will also have social benefits by providing a good first impression for visitors and residents of Gravesend, reinforcing Gravesend as a place for where people are happy to live, work and visit.
 - Providing a well-designed and safe built environment on a vacant site, removing the risk of trespass and anti-social behaviour.
 - Meeting an identified need for ultra-rapid hyper chargers in the local area, the South East, and alongside the A2, thereby serving users of strategic road network and the local road network. Providing ultra-rapid hyper chargers allows customers to charge their vehicles up to 80% in 20 minutes. The provision of such facilities will help to reduce 'range anxiety', and support the wider take-up of electric vehicles, whilst supporting those who have already transitioned to EV vehicles.
 - Improving pedestrian and cycle links in and around the site for the benefit of local residents.
 - Improving the offer of convenience goods in the local area, plus provision of a café.

Environmental Benefits

- 12.8 The UK Government is committed to reduce UK greenhouse gas emissions to net zero by 2050. The NPPF states that climate change mitigation and adaptation is one of the key components of meeting the environmental objective in achieving sustainable development. The NPPF requires that new development will be expected to minimise energy consumption and comply with any development plan policies on local requirements for decentralised energy supply, subject to viability and feasibility.
- 12.9 The proposed development evidently has substantial environmental benefits, including:
- Supporting the transition to a low carbon future through the promotion and provision of low emission transport infrastructure, in accordance with paragraph 157 of the NPPF which requires the planning system to support the transition to a low carbon future in a changing climate as part of the nationwide effort to significantly cut greenhouse gas emissions.
 - Providing EV charging infrastructure powered by a supply from 100% renewable energy. BP Pulse guarantees their supply is 100% renewable - powered by solar, wind or hydropower, - by purchasing power from certified Renewable Energy Guarantees of Origin (REGO). This aligns with paragraph 157 of the NPPF and is supported by PPG (Reference ID: 5-001-20140306)
 - The effective and efficient use of a brownfield site reduces pressure on greenfield land.
 - As set out in Section 8 of this Statement (and confirmed within the LVA prepared by Huskisson Brown) the proposal would have a positive impact on the spatial and visual openness of the Green Belt when compared to the existing site situation (including a reduction in built volume on site of 74.33% and a 75.06% reduction in building footprint). Further, as confirmed in the Hotel Needs Assessment prepared by G+S, there is a reasonable prospect of the site coming back into use as a hotel, which would have a demonstrably less positive impact on the Green Belt than the proposed development. The proposal therefore represents a betterment to the site in Green Belt terms comparative to the existing situation, and the fallback position.
 - The proposal would conserve and enhance the natural environment (including the landscape character) by improving the existing condition of the site. The demolition of the existing former Tollgate Hotel and replacement with a high quality, carefully designed proposal that has been developed in light of the sites topography, immediate context, and the need to ensure views to and of the site are minimal, and would enhance the wider landscape character area.
 - As set out within the Flood Risk and Drainage Strategy prepared by Weetwood, the site is at low risk of flooding from all sources, and therefore is sequentially preferable in flood risk terms. With regard to managing disposal of surface water, the proposal has responded to the Sustainable Drainage hierarchy, and proposes an infiltration, including an infiltration basin, as the primary means of disposing of surface water, which rates high on the SuDs hierarchy and has the added ecological and biodiversity benefits.
 - The proposal would improve the Arboricultural amenity of the site by planting 57 new native trees and minimising the loss of existing trees.
 - A lighting design has been prepared to restrict and diminish any risk of light pollution to the surrounding landscape. The Lighting Assessment confirms that there will be no significant additional light pollution from the subject site, and the proposal would have no harmful impacts on the rural amenity or night sky cover above the existing baseline condition. The proposal would replace the existing vegetation with high quality landscaping that has maximised creation of high-quality habitats whilst improving the visual amenity of the site.
 - Biodiversity improvements, including a biodiversity net gain of 14.81%

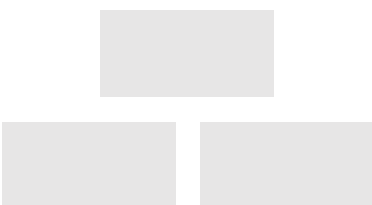
Summary

- 12.10 Identified individually, the matters set out above in this section each constitute material considerations which should be weighed in favour of the grant of planning permission for the proposed development. The support the proposed development provides in the transition to a low carbon future through the promotion and provision of low emission transport infrastructure is considered to carry considerable weight. That BP Pulse use certified 100% renewable energy (from solar, wind or hydro power) adds further weight to the sustainability credentials of the proposed development.
- 12.11 When the above listed benefits are taken together, it is however also clear that individually and when taken together, the benefits listed also constitute a compelling suite of very special circumstances that clearly outweigh any harm to the Green Belt by reason of any perceived inappropriateness of the proposed development in the Green Belt, and any other harm resulting from the proposal (of which none has been identified).

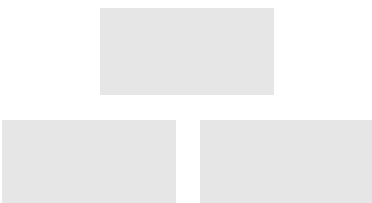
13 CONCLUSIONS

- 13.1 The application is in accordance with up-to-date policies in the Development Plan, and is entirely in accordance with the policies in the NPPF, and there are no reasons for refusing the development in these terms. The proposal will bring forward a range of planning benefits, and no material detrimental impact arises. The application addresses all relevant planning-related material considerations, and planning permission should be granted by the local authority at the earliest opportunity.
- 13.2 The development addresses all relevant development management considerations, and the application submissions identify a range of improvements that will arise as a result of the development (for example, BNG and drainage).
- 13.3 The application addresses all the matters raised in the Note, to the extent that they are relevant to the development (given that the development proposals have materially changed).
- 13.4 In relation to the proposed development's location in the Green Belt, the following conclusions can be drawn.
- 13.5 The proposed development falls into two categories identified as exceptions to inappropriate development in the Green Belt. The proposed development would at the same time have a positive impact on the openness of the Green Belt, in comparison with:
- the current, vacant, condition of the site, and
 - circumstances whereby the site was brought back into use as a hotel.
- 13.6 Notwithstanding this, and in the alternative, the benefits of the proposed development present very special circumstances which would outweigh any perceived harm to the Green Belt.

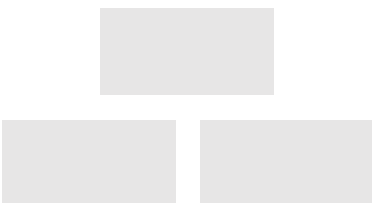
Site Location Plan



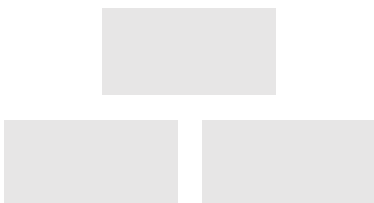
Existing Site Layout



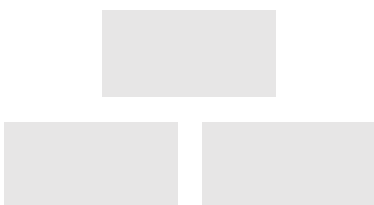
Existing Development Schedule



Planning History Schedule



Officer Report to Committee Meeting (4 September 2019)



Representations in relation to the Emerging Local Plan Partial Review



Pre-application request to local authority (May 2022)



Pre-application package to local authority (July 2023) including response from local authority (September 2023)



Pre-application response from National Highways (11 July 2024) and Kent County Council Ecological Advice Notes (06 August 2024 and 14 August 2024)



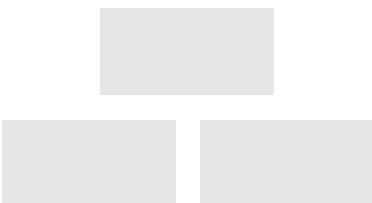
Public Consultation Letter and Distribution Area



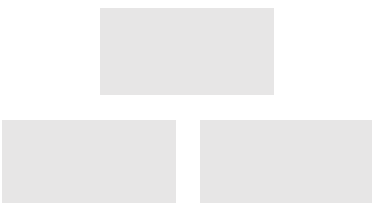
Public Notice of Consultation



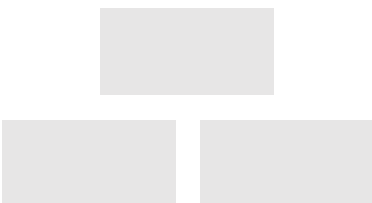
Public Consultation Website



Public Consultation Website: Feedback Report & Full Responses



Business Needs Case and Rational prepared by BP Pulse



Proposed Electric Vehicle Road Network Service Area with Amenity Building and Ancillary Traditional Fuels Need Assessment



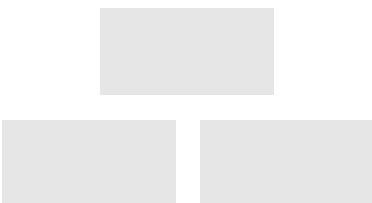
Conditions Reports / Structural Surveys by Haliday West Ltd, Chartered Building Surveyors



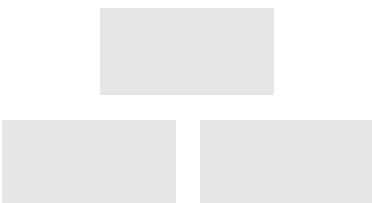
Existing and Proposed Area and Volume Calculations prepared by MBH Architecture



Hotel Needs Assessment prepared by Graham + Sibbald LLP

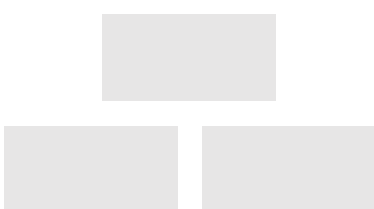


Plan depicting Option (b): Extending or altering the buildings on site



Plan depicting Option (c): The replacement of part of the built form on site







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