

FINAL FOR PLANNING

LANDSCAPE AND VISUAL APPRAISAL INCLUDING A CONSIDERATION OF THE GREEN BELT

relating to

**Proposed redevelopment of the former Tollgate Motor Hotel,
Wrotham Road, Gravesend, Kent, DA13 9RE**

on behalf of

BP Pulse

May 2024

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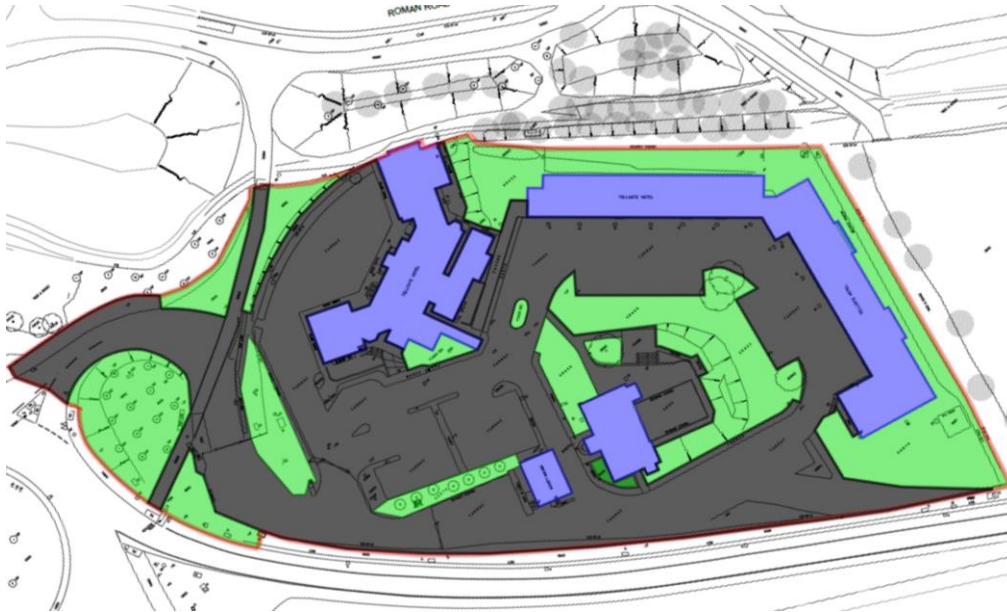
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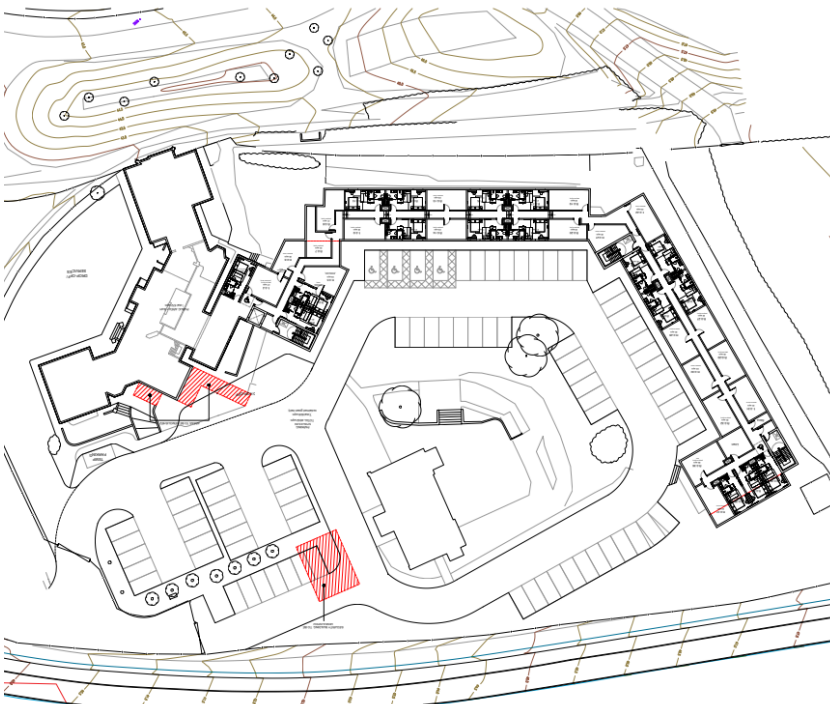
1 INTRODUCTION

- 1.1 Huskisson Brown Associates (HBA) is a firm of Chartered Landscape Architects, established in 1987 and registered since then with the Landscape Institute. HBA has been a member of the Institute of Environmental Management and Assessment since 1992.
- 1.2 The practice has undertaken a range of landscape and visual assessment work for many clients including public bodies, private companies and individuals. This includes projects in the commercial, industrial, retail, recreational, healthcare, agricultural, infrastructure and residential development sectors, including the presentation of evidence at Public Inquiries. The Practice has also given extensive development management advice to Local Planning Authorities on a wide range of projects.
- 1.3 The practice is now retained on the instruction of Mr J. Lowes, Partner - Planning Division, of Rapleys, acting on behalf of BP Pulse in connection with the proposed redevelopment of a Motorist Service Station (MSS) on the site occupied by the former Tollgate Motor Hotel, Wrotham Road, Gravesend, Kent, DA13 9RE. The site location is illustrated on **Figure HBA 1**.
- 1.4 HBA was previously retained to provide landscape consultancy and prepare landscape assessments in relation to earlier planning applications for the redevelopment of the same site as petrol filling station with other services. The preceding history will be briefly described further in this section.
- 1.5 HBA is now appointed to undertake a Landscape and Visual Appraisal (LVA) of a new redevelopment proposal for the former Tollgate Motor Hotel site for the demolition of existing buildings to provide an EV charging hub and petrol filling station, including 24 charging bays and supporting electrical infrastructure (12 charging upstands, three substations and two network cabinets), six pump islands with canopy above, a forecourt shop/amenity building, customer parking, two air and water spaces and associated hardstanding and landscaping, accessed from the Wrotham Road/eastbound A2 roundabout junction.
- 1.6 In June 2022 HBA prepared a scoping report for agreement with Gravesham Borough Council (GBC) setting out the methodology to be used and the issues to be addressed in an LVA for the new MSS. The scoping report set out that the appraisal would draw comparison between the proposed motorist service station (MSS illustrated on the planning application drawings) against the site in its current unused/defunct form (**Basis 1**, shown on the drawing 'Existing Site Layout Areas 1-500' BP drawing no: EV005-PS-LAY-000-GB00015044 in HBA Appendix 4). An extract of the Basis 1 plan is illustrated at **LVA Report Figure 1** below).



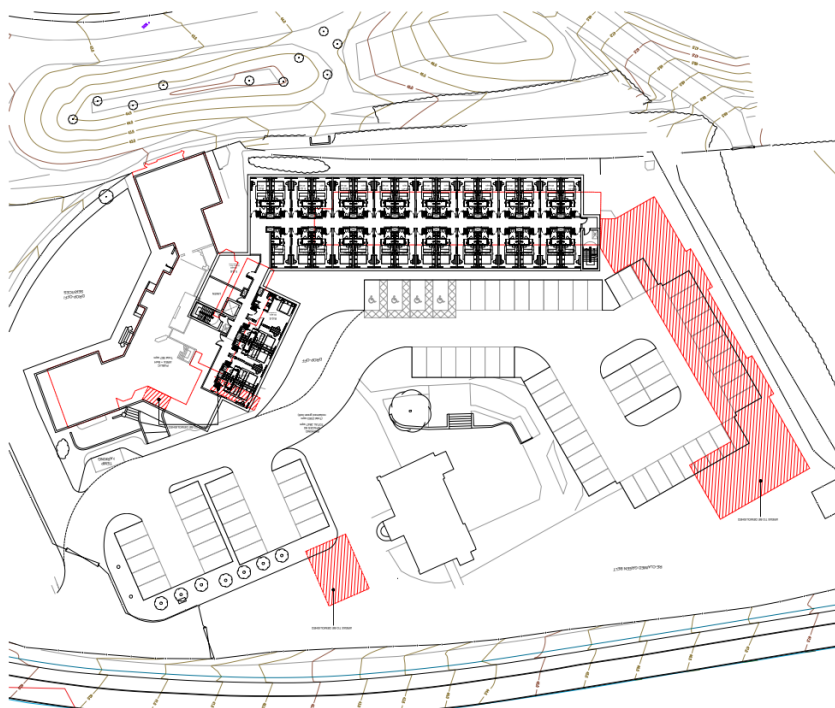
LVA Report Figure 1. Basis 1 – Extract of BP drawing no: EV005-PS-LAY-000-GB00015044 in HBA Appendix 4

- 1.7 A further comparison was also identified for consideration in the LVA, that being the site in its current layout and form being returned to commercial use as before the site was compulsorily acquired for the A2 road improvements works (**Basis 2**, shown on Drawing No 8311-LRW-ZZ-00-DR-A-00-100 in HBA Appendix 4, with an extract at **LVA Report Figure 2** below). Basis 2 represents the applicant's fall-back position in the event that planning permission is not granted. Areas hatched in red on the drawing indicate buildings to be removed.



LVA Report Figure 2. Basis 2 - Drawing No 8311-LRW-ZZ-00-DR-A-00-100

- 1.8 Since the Scoping report was presented to the GBC, the client has identified a further fall-back position. This would include returning the site to a hotel use with the former motel building demolished and replaced with a new hotel building, of smaller footprint, in place of the northern wing of the demolished motel, together with some changes to the car parking (**Basis 3**, shown on Drawing No 8311-LRW-ZZ-00-DR-A-00-102 in **HBA Appendix 4** with an extract on **LVA Report Figure 3**. below).
- 1.9 GBC provided comments on the scoping report including requesting consideration of further viewpoints with the LVA. These are accommodated within this report.
- 1.10 Although the Scoping Report and methodology were agreed with GBC, the methodology now used in this LVA is marginally different from that agreed due to the passing of time and updates to the methodology to reflect the current approaches set out within GLVIA3, TGN 02-21 and draft updates to the Statements of Clarification and Technical Information Notes on GLVIA3 by the Landscape Institute.



LVA Report Figure 3 – Basis 3 Drawing No 8311-LRW-ZZ-00-DR-A-00-102

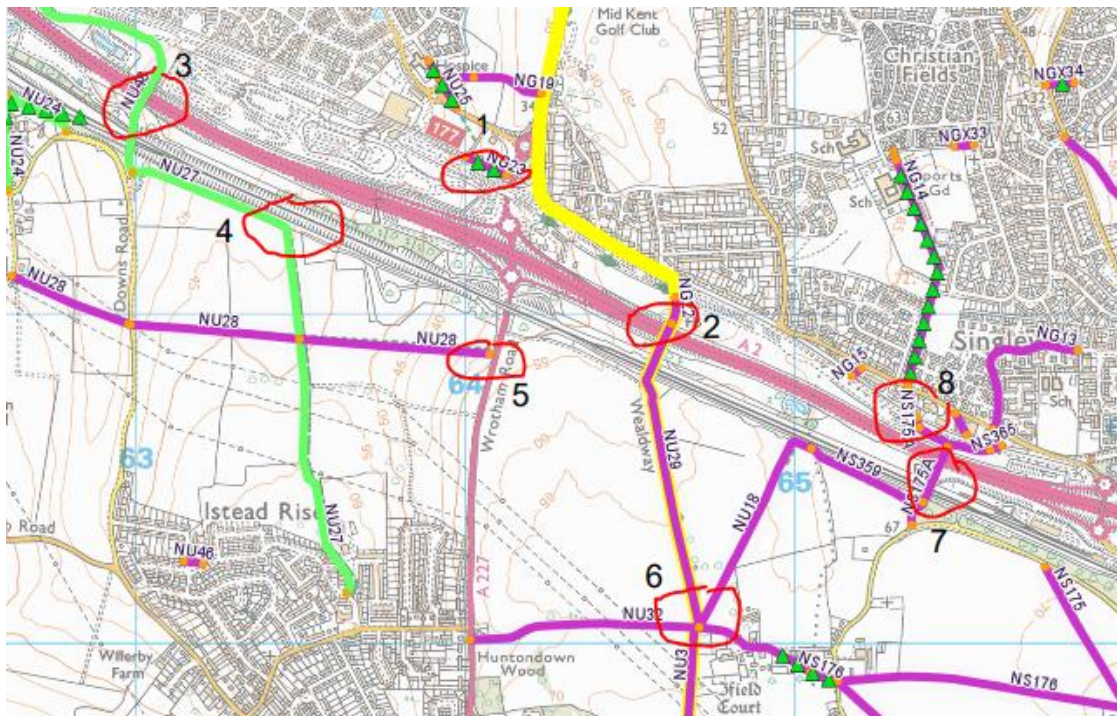
- 1.11 Because of the site's location within the Metropolitan Green Belt, HBA was also asked to consider the implications of the proposed redevelopment on the Green Belt, in particular on openness. The implications of the proposed MSS development on the Green Belt are compared against the same bases 1, 2 and 3 as described above.
- 1.12 The planning history of the site is complex and is not covered in any detail within this LVA.
- 1.13 However, it is relevant to note that HBA originally undertook a high level Landscape and Visual Overview of a previously proposed redevelopment for a Petrol Filling Station and associated services in 2012. The purpose of this earlier work was to inform BP in their pre-

application discussions with GBC and to inform and indicate a draft landscape strategy.

- 1.14 A planning application (ref: 20160215) was then submitted and rescinded and subsequently resubmitted and an appeal lodged against non-determination of the application. Putative reasons for refusal were given by GBC upon submission of appeal, and the appeal was withdrawn in January 2020. HBA prepared an LVA of the resubmitted scheme in support of the non-determination appeal.
- 1.15 As previously noted, HBA has now been appointed to undertake an LVA of new redevelopment proposals for a Motorist Service Station (MSS) on the site.
- 1.16 Current guidance on LVA is set out in The Guidelines for Landscape and Visual Impact Assessment – Third Edition (GLVIA3). This places an *“emphasis on likely significant effects and stresses the need for an approach that is proportional to the scale of the project that is being assessed and the nature of the likely effects”*. The main issues of landscape and visual relevance are therefore addressed in the following LVA report.
- 1.17 GLVIA3 (Chapter 1, Para 3.3 and Table 3.1) makes a distinction between a Landscape and Visual Impact Assessment (LVIA) that is carried out as a part of an Environmental Impact Assessment (EIA) where there is a requirement to determine “significance of effects” in EIA terms, and LVIA that is carried out as part of an appraisal of development proposals (ie. non-EIA) where the identification of the “significance of effects” (in terms of the EIA regs) is not required. An LVA can be more informal but shares the essence of the approach adopted in EIA.
- 1.18 As the proposal that is the subject of this application is not subject to an EIA, the report has been termed an appraisal. Consequently, where the term significant is used in this LVA, it is used in the local context of the application as opposed to significance in EIA terms.
- 1.19 The purpose of the LVA is to advise on the potential landscape and visual implications arising from the proposed redevelopment of the site for an MSS
- 1.20 The LVA records the landscape and visual baseline and identifies the attributes and sensitivities of the site and its surroundings. It identifies relevant landscape and visual receptors and determines the sensitivity to change of those receptors to the specific development proposed in the accompanying outline application. It identifies and assesses the predicted landscape and visual effects of the proposal. Landscape and visual mitigation measures are also identified and a landscape strategy presented that makes outline landscape and visual recommendations for the scheme (Refer to **Figures HBA 5 Landscape Strategy**). The Landscape Strategy has been developed in consultation with the project ecologists to deliver biodiversity net gain (BNG) (Refer to **Figure HBA 6 BNG Strategy** and separate BNG Assessment by Eco-Tech.
- 1.21 It is envisaged that, should the planning application be approved, the strategy would form the basis of any detailed planting proposals and other landscape design, or management information required by condition.
- 1.22 The LVA methodology adopted for this assessment which follows the guidelines in GLVIA3

and TGN 02-21, is set out in **HBA Appendix 1**.

- 1.23 The preparation of this LVA has involved both desk based and site work and has built upon previous knowledge gained from earlier inputs. An initial site visit was carried out on 7th September 2022. The visit involved a walkover review of the site, walking Public Rights of Way (PRoW) and side roads in the local area, and driving the main roads to help determine the landscape character and visual context of the site and surrounding area, and to evaluate the degree of change that might be expected to arise from the proposed redevelopment. The site visit was carried out in good weather conditions with the vegetation fully foliated, thus the visibility of the site can be considered to have been assessed when it is most screened.
- 1.24 Another site visit was undertaken on 19th January 2023, following a request from GBC on 28th November 2022 in response to the scoping report, to investigate visibility from 8 specific locations on PRoW as marked a map provided by GBC, reproduced on **LVA Report Figure 4** below and in HBA Appendix 6. This site visit was carried out in good weather conditions when vegetation was defoliated, thus with the site being viewed when it is the least screened. With regard to the viewpoint locations identified by GBC, it was found that:
- The site is visible from locations 1 and 2. In the LVA, location 1 is represented by **Viewpoint 6 Photosheet 8**, and location 2 is represented by (**Viewpoint 8 Photosheet 10**).
 - The site is not visible from locations 3 to 8 and therefore the redevelopment is not considered to have a landscape or visual impact on those locations, and they are not considered in this LVA.



LVA Report Figure 4. Markup of requested viewpoints from GBC – (HBA Appendix 6)

- 1.25 The assessment findings have been informed by the following drawings, those in **bold** comprising the planning application drawings.
- *EV005-PS-LAY-000-GB00015044 EXISTING SITE LAYOUT AREAS 1-500* (provided at HBA Appendix 4)
 - ***EV005-PS-GAS-000-GB00015044-0001-001 Proposed Building Details Rev C***
 - ***EV005-PS-LAY-000-GB00015044-0005-001 Proposed Site Layout Rev F***
 - ***EV005-PS-LAY-000-GB00015044-0005-002 Proposed Site Layout 1-500 Rev B***
 - ***EV005-PS-LAY-000-GB00015044-0004-001_B01 Proposed Site Elevations Rev F.***
- 1.26 In addition to the above and the original Landscape and Visual Overview report prepared by HBA in 2012, and the LVIA prepared by HBA in 2018, the following documents and sources are considered to be the primary ones of relevance to the LVA and the landscape and visual context of the site and its immediately surrounding area:
- *National Planning Policy Framework, December 2023*
 - *Gravesham Local Plan Core Strategy adopted September 2014*
 - *Gravesham Local Plan First Review, Saved and Deleted Policies Version (September 2014)*
 - *Gravesham Stage 2 Green Belt Study, Final Report, (August 2020), by LUC for Gravesham Borough Council*
 - *Gravesham Stage 2 Green Belt Study, Appendix A Final, by LUC for Gravesham Borough Council*
 - *Gravesham Green Infrastructure Background Paper (Regulation 18 Stage 2 Consultation)*
 - *National Character Area Profile 113 North Kent Plain, (2013), Natural England.*
 - *The Landscape Assessment of Kent, (October 2004), Jacobs Babbie for Kent County Council*
 - *The Gravesham Landscape Character Assessment and Guidelines (2009), Jacobs for Gravesham Borough Council*
 - *The Kent Historic Landscape Characterisation (May 2001), Kent County Council, English Heritage, Oxford Archaeological Unit*
 - *Online review of current and historic Ordnance Survey mapping, Historic England website, MAGIC website, Kent Landscape Information (K-LIS) website, Google Earth and Google Maps*
 - *Guidelines for Landscape and Visual Impact Assessment, (GLVIA3) (April 2013), the Landscape Institute and the Institute of Environmental Management and Assessment*
 - *An Approach to Landscape Character Assessment, (October 2014), Natural England*

- *TGN 06/19 Visual Representation of Development Proposals, the Landscape Institute*
- *TGN 02-21 Assessing landscape value outside national designations, the Landscape Institute*
- *Draft TGN 05/23 Notes and Clarifications on aspects of GLVIA3, the Landscape Institute. (Replaces and consolidates GLVIA3 Statements of Clarifications and TIN 01/21 GLVIA).*

2 LANDSCAPE POLICY CONTEXT

- 2.1 A summary of the hierarchy of planning policies relevant to this report, the landscape context of the site, and the proposed development is set out below.

Adopted Local Plan and Policy

- 2.2 The Development Plan for Gravesham comprises the Gravesham Local Plan Core Strategy adopted in September 2014 (GLPCS), the remaining 'saved' policies in the Local Plan First Review (1994) and the saved policies in the Kent Minerals and Waste Local Plans.
- 2.3 There are very few policies of direct relevance to the Tollgate site. CS12: Green Infrastructure, refers at 5.7.22 to a multifunctional linked network of greenspaces, footpaths, cycle routes and wildlife stepping stones and corridors being created, protected, enhanced and maintained and notes that key parts are identified on Figure 19: Strategic Green Infrastructure Networks.
- 2.4 Figure 19: Strategic Green Infrastructure Network map in the GLPCS shows that the whole site lies within a Biodiversity Opportunity Area. The site is also adjacent to an identified movement corridor and long-distance walking route.
- 2.5 Paragraph 5.7.24 states that *'there will be no net loss of biodiversity in the Borough, and opportunities to enhance, restore, re-create and maintain habitats will be sought, in particular within the Biodiversity Opportunity Areas shown on the Strategic Green Infrastructure Network map (Figure 19) and within new development'*.
- 2.6 Paragraph 5.7.26 states that *'the overall landscape character [...] will be conserved, restored and enhanced. Proposals are required to take account of the Gravesham Landscape Character Assessment'*.
- 2.7 Policy CS19 deals with Development and Design Principles. Paragraph 5.15.14 requires that *new development will be visually attractive, fit for purpose and locally distinctive*. It is required to conserve and enhance the character of the local built, historic and natural environment and integrate well with the surrounding local area. It sets out various criteria by which these aims are to be met.
- 2.8 With regard to the Gravesham Local Plan First Review, Saved and Deleted Policies Version (September 2014), there are no saved policies that are considered relevant to the proposal.

National Planning Policy Framework

- 2.9 The National Planning Policy Framework (NPPF) (Revised December 2023) sets out the Government's national planning policy for England. The NPPF is a material consideration in determining planning applications (Paragraph 2). The Framework should be read as a whole (including its footnotes and annexes) (Paragraph 3). Its overall thrust is to promote sustainable development (Paragraph 7).
- 2.10 Paragraph 8 states that *"the planning system has three overarching objectives, which are*

interdependent and need to be pursued in mutually supporting ways (so that opportunities can be taken to secure net gains across each of the different objectives).

a) an economic objective: ...

b) a social objective: ...

c) an environmental objective: This is described as *“to protect and enhance our natural, built and historic environment; including making effective use of land, improving biodiversity, using natural resources prudently, minimising waste and pollution, and mitigating and adapting to climate change, including moving to a low carbon economy”*.

2.11 Paragraph 11 deals with the presumption in favour of sustainable development. For decision-taking 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:*
 - i. the application of policies in this Framework that protect areas or assets of particular importance provides a clear reason for refusing the development proposed; or*
 - ii. 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.”*

2.12 NPPF Paragraph 135 requires that: *“Planning policies and decisions should ensure that developments:*

(a) will function well and add to the overall quality of the area, not just for the short term but over the lifetime of the development;

(b) are visually attractive as a result of good architecture, layout and appropriate and effective landscaping;

(c) are sympathetic to local character and history, including the surrounding built environment and landscape setting, while not preventing or discouraging appropriate innovation or change (such as increased densities);

(d) establish or maintain a strong sense of place, using the arrangement of streets, spaces, building types and materials to create attractive, welcoming and distinctive places to live, work and visit;

...”

2.13 NPPF Paragraph 136 places emphasis on the importance of tree planting, stating that *“Trees make an important contribution to the character and quality of urban environments, and can also help mitigate and adapt to climate change. Planning policies and decisions should ensure that new streets are tree-lined ⁵³, that opportunities are taken to incorporate*

trees elsewhere in developments (such as parks and community orchards), that appropriate measures are in place to secure the long-term maintenance of newly-planted trees, and that existing trees are retained wherever possible. Applicants and local planning authorities should work with highways officers and tree officers to ensure that the right trees are planted in the right places, and solutions are found that are compatible with highways standards and the needs of different users”.

- 2.14 At paragraph 142, the NPPF restates that the Government attaches great importance to Green Belts. The fundamental aim of Green Belt policy is to prevent urban sprawl by keeping land permanently open; the essential characteristics of Green Belts are their openness and their permanence.
- 2.15 Paragraph 143 of the NPPF sets out the five key purposes of Green Belt, the fifth one being: *“to assist in urban regeneration, by encouraging the recycling of derelict and other urban land”.*
- 2.16 Once Green Belts have been defined, Paragraph 150 of the NPPF advises: *“that local planning authorities should plan positively to enhance their beneficial use, such as.....to enhance landscapes, visual amenity and biodiversity; or to improve damaged and derelict land.”*
- 2.17 With regard to proposals affecting the Green Belt, paragraph 152 reiterates the long-standing guidance that *“Inappropriate development is, by definition, harmful to the Green Belt and should not be approved except in very special circumstances”.* Paragraph 153 requires that *“local planning authorities should ensure that substantial weight is given to any harm to the Green Belt. ‘Very special circumstances’ 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”.*
- 2.18 Paragraph 154 identifies several types of development that may be exceptions to the usual presumption that the construction of new buildings are inappropriate in the Green Belt. The exceptions include:
- “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 (represented by Basis 2 in this LVA)*
- d) the replacement of a building, provided the new building is in the same use and not materially larger than the one it replaces (represented by Basis 3 in this LVA);*
- ...
- 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;”*

2.19 Paragraph 154 (g) is considered to represent Basis 1 considered in this LVA.

2.20 Paragraph 155 of the NPPF also notes:

“Certain 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:

...

c) local transport infrastructure which can demonstrate a requirement for a Green Belt location”

2.21 Paragraph 180 of the NPPF requires that: *“Planning Policies and decisions should contribute to and enhance the natural and local environment by:*

a) protecting and enhancing valued landscapes, sites of biodiversity or geological value and soils (in a manner commensurate with their statutory status or identified quality in the development plan);

b) recognising the intrinsic character and beauty of the countryside, and the wider benefits from natural capital and ecosystem services – including the economic and other benefits of the best and most versatile agricultural land, and of trees and woodland;”

2.22 The NPPF does not define what is a ‘valued landscape’ but case law, GLVIA3 and recent LI TGN 02-21 give useful guidance.

3 LANDSCAPE CHARACTER

- 3.1 Landscape character is defined in the Guidelines for Landscape and Visual Impact Assessment 3rd Edition (GLVIA3) as:

“A distinct, recognisable and consistent pattern of elements in the landscape that makes one landscape different from another, rather than better or worse.”

- 3.2 The general hierarchy of the published landscape character studies relevant to the site and its location are set out below.

- 3.3 Map extracts from the relevant published studies are illustrated on **Figure HBA 3**. Relevant text extracts from the published studies are provided in the LVA appendices.

Regional Landscape Character

- 3.4 The site and surroundings lie within National Character Area (NCA) **113 North Kent Plain**, as defined by Natural England in the NCA Profiles. This relates to a swathe of land running generally east to west between the Greater Thames Estuary (NCA 81) to the north and the North Down (NCA 119) to the south.

- 3.5 Some of the key characteristics of NCA 113 that are relevant to the overall character of the landscape surrounding the site are:

- *An open, low and gently undulating landscape, characterised by high quality, fertile, loamy soils dominated by agricultural land uses.*
- *Large settlements and urban infrastructure (including lines of pylons) are often visually dominant in the landscape, with significant development around Greater London and the Medway Towns, as well as around towns further east and along the coast. Major rail and road links connect the towns with London.*

- 3.6 Statements of Environmental Opportunity (SEO) are set out on pages 15-18. SEO 4 is relevant to the location of the site, this being to ‘*Protect and enhance the strong character and heritage of the urban areas. Plan for the creation of significant new areas of green space and green corridors to provide a framework for new and existing development in urban areas and along major transport routes. For example, by:*

- *Targeted planting of areas of broadleaved woodland, building the urban and peri-urban green infrastructure around towns where appropriate – particularly Dartford, Gravesend and Medway, but also Bromley and Bexley. These woodlands may provide a screening function and a further recreational resource, as well as a local source of wood fuel (where managed through coppicing). In addition, conserving the existing urban treescape and seeking opportunities for urban tree planting, helping to regulate climate change.*

County and Borough Landscape Character

- 3.7 The Landscape Assessment of Kent (2004) shows the site to lie just within the **Southfleet Arable Lands** landscape character area. Southfleet Arable Lands abuts the southern edge

of Gravesend and extends south.

3.8 Selected descriptions of this area include:

“North of Southfleet, the landscape is heavily influenced by transmission lines and development on the rises at Northfleet and the Gravesend suburbs. With many hedges removed, the arable fields, old windbreaks and roadside lighting all stand out.

3.9 At the time the Kent assessment was prepared, the following statement described the situation south of the urban edge of Gravesham;

The Channel Tunnel Rail Link (CTRL) is located adjacent to the A2, skirting Gravesend, before swinging north to travel under the Thames. This has resulted in a trapped section of land (termed the 'sandwich land') between the road and the rail-link.

3.10 The assessment's landscape analysis for the Southfleet Arable Lands character area identifies that the condition is “very poor” whilst sensitivity is noted as “moderate” with a “weak” sense of place. The landscape actions are to “Restore and Create”.

3.11 The above descriptions can be considered to apply to the wider general setting of the site, but they are significantly out of date in terms of reflecting the situation on the ground as they do not accurately record the further marked changes that have occurred in the 'sandwich land' by virtue of the realigned A2 and the removal of the former A2.

3.12 The current situation is more accurately reported in a more detailed assessment in 2009. This assessment, the Gravesham Landscape Character Assessment and Guidelines, identifies that the site lies in the **Gravesend Southern Fringe** Local Landscape Character Area. A map extract from the Gravesham Study is provided on **Figure HBA 3** which also includes an interpretation of how the Gravesham Southern Fringe relates to the site.

3.13 The Gravesham Assessment describes the Gravesend Southern Fringe as:

“a linear character area that runs along the southern edge of Gravesend with an additional area that feeds into the urban edge and is encompassed by Gravesend suburbs. The majority of the character area is sandwiched between the urban edge and the realigned A2 trunk road and the Channel Tunnel Rail Link (CTRL).

Originally this area would have been part of the Istead Arable Farmlands, with the countryside abutting the southern edge of Gravesend and reaching in towards the town centre along the valley feature north of Tollgate. The location of the CTRL away from the urban edge and relocation of the A2 adjacent to it have cut off this area from its traditional context and, whilst sharing the physical characteristics of the countryside to the south, the influence of the urban edge and dominance of the infrastructure have been so great that it is appropriate to consider this as a separate character area. The landform is very gently undulating and generally rises from north to south. A distinct dry valley feature leads towards the town centre bringing the countryside into the urban area and creating an attractive approach to the town. From within the linear section of the character area there are extensive internal views running east and west. In addition,

there are extensive views looking out of the character area towards the countryside in the south and across Gravesend towards the River Thames to the north.

The A2 has recently been relocated adjacent to the north side of the CTRL and the old carriageways and some of the open space between the new A2 and the urban edge has been remodelled to create a new recreational landscape or linear park including a footway and cycleway running its entire length. Footpaths also cross the area linking the town to the countryside. (Emphasis added by HBA)

- 3.14 The Gravesham assessment ranks the Condition of the Gravesend Southern Fringe LCA as **Poor** and considers that *“the landform is the strongest and most robust landscape feature, particularly the dry valley into Gravesend, providing a constant in this changing landscape”*. It notes that the area has many visual detractors *“including pylons, the A2, major road junctions and the CTRL and various items of infrastructure. The reinstatement of the former A2 to the landscape locally improves this area however the fragmentation and dominance of the infrastructure in the wider character area remains.”*
- 3.15 The Sensitivity of the landscape of the Gravesend Southern Fringe LCA, is assessed in the Gravesham assessment as being **Moderate**. It considers that: *“the majority of landscape elements including field layout, boundaries and planting are indistinct and recent, the character area has a very weak sense of place. The landscape elements are mostly dictated by road, CTRL or urban development. The undulating topography and limited tree cover means there is high visibility within the character area”*.
- 3.16 Guidelines for the Gravesend Southern Fringe LCA are to *“Restore and Create”*. Some of the ways this may be achieved are identified, including the following:
- *Create a new landscape identity and function appropriate to its urban edge location and status as gateway to Gravesend and Kent Thameside.*
 - *Restore the fragmented landscape, restoring and creating landscape structure in parcels of land cut off by the major transport routes.*
 - *Consider ways to integrate new and existing development into the landscape using traditional landscape elements.*
 - *Improve design standards for new development within the area and consider ways to reduce impact of visual detractors and infrastructure.*
- 3.17 The above character assessments, most notably the Gravesham assessment and its characterisation of the Gravesend Southern Fringe LCA in which the Tollgate site lies at a nodal point, is considered particularly apposite, encapsulating the raft of issues relating to this remnant landscape.
- 3.18 They also identify the issues that should be taken into account in ensuring that a development / redevelopment proposal can be suitably treated so as to marry in satisfactorily with its surroundings and contribute to the sense of place.

4 LOCATION AND BASELINE CONTEXT

- 4.1 The site location and the extent of the study area are shown on Ordnance Survey mapping at **Figure HBA 1** and on the aerial photograph at **Figure HBA 2**. The proposed study area has been informed by the visual studies previously undertaken and agreed with GBC in the scoping report for this LVA, as covering a 1km extent from the site boundary.
- 4.2 The Primary Visual Envelope (PVE) is illustrated on **Figure HBA 4** and is shown alongside the PVE identified in earlier studies from 2012 and 2018 to help demonstrate how the visibility of the site has changed over time.
- 4.3 The local context showing the red line application boundary, extent of Green Belt and Public Rights of Way in the study area are illustrated on **Figure HBA 1**. Photographs of the site and looking towards the site are shown on a series of **Photosheets 1- 11** with the locations of the photographs identified on **Figure HBA 4**.
- 4.4 The redevelopment proposal's red line covers the former Tollgate Motel site, illustrated by reference to the topographic survey at **Appendix 4**. (Some of the existing vegetation within the immediate vicinity of the buildings has been cleared relatively recently and is not reflected on the topographic survey. The current vegetation cover is shown on the arboricultural survey). The boundaries of the overall former Motel site are described below. The exact boundaries are delineated on the application plans.
- 4.5 To the north east, the boundary abuts the edge of the former A2, now largely marked by hedgerow growth, giving way onto the "green corridor" developed on the former road corridor. The old road surface has been largely broken out and removed to leave a cycleway / footpath, forming part of the regional recreational route, the Wealdway, that crosses Kent and Sussex from the Thames to the south coast. Mounding and planting have been carried out to give some element of visual enhancement and containment. These new landforms appear artificial, but over time they have been softened and screened by the maturing vegetation.
- 4.6 National Cycle Route 177 follows the former A2 alignment offset from the site's northern boundary, sharing the corridor with the Wealdway.
- 4.7 The eastern boundary of the motel site is formed by a fence and abuts unmanaged land with ruderal vegetation that used to be an arable field with a hedgerow separating the land from the site. The hedgerow adjacent to the fence is offsite but there is a small area of vegetation within the site abutting the southern end of the hedgerow.
- 4.8 The southern boundary is marked by a site hoarding set to the rear of the verge of the eastbound slip road from the northern roundabout of the A227 Wrotham Road that gives access to the A2. This road passes the site, raised above it on an embankment, the slip road climbing to the east on a similar gradient to the sloping site.
- 4.9 South of the new A2 is another narrow band of land, heavily planted as a screen to the Channel Tunnel Rail Link (CTRL) that runs parallel with the A2, set in a wide corridor in a

cutting.

- 4.10 The western boundary follows a generally curved line that appears to relate to the former road alignment and access arrangements, but which now slightly divorces the site from the new road frontage because of the open land between the new A2 - A277 roundabout and the site. The control / ownership of this land is assumed to be vested in the Highway Authority. A rather elongated access road now links between the new roundabout and the site's western frontage.

Landform and levels

- 4.11 The topography of the site and its immediate surroundings is important to an appreciation of the site in relation to both its landscape and visual context. The landform is characterised by its generally gently rolling form comprised of a series of approximately north - south valleys or coombes (dry chalk valleys) that mark the toe of the dip slope to the North Downs which rise to a plateau some distance to the south of the site. Whilst the historic line of roman Watling Street crosses these undulations, the A227 follows an alignment along the base or side of a coombe.
- 4.12 As will be appreciated from the Gravesham Landscape Character Assessment, the site lies on what is the eastern flank of a dry valley running north from the North Downs although this relationship has now been heavily masked by the A2 realignment and the CTRL so that the site now appears to lie in its own fold in the landscape between the urban area to the north and the A2 earthworks and overbridge to the south.
- 4.13 The topographical survey (**Appendix 4**), which is related to Ordnance Survey Datum, shows that the site rises from about 40m Above Ordnance Datum (AOD), near the existing site entrance on the western boundary, to nearly 49m AOD at the north eastern corner. This rise is over a distance of about 110m giving a gradient across the site of around 1V:12H. The south eastern boundary is nearly level, falling only by about 1.0m to the south by the A2 slip road.
- 4.14 Beyond the site, land contours are shown on the Ordnance Survey mapping on **Figure HBA 1**. To the north of the former A2 alignment, the land is higher with housing set locally above a retaining wall with a pedestrian ramp leading down to the roundabout. To the east, the land continues to rise, but less steeply, along the narrow strip of arable land between the A2 and its former alignment. About 300m east of the site, the Wealdway turns south to cross the A2 and the CTRL. The ground level here is estimated to be about 60m AOD. From here there is an open view north west looking across the site to the rising ground on the outskirts of Gravesend at New House, Pepper Hill and Wombwell Park. The A2, and in places the CTRL, are prominent and significant detractors in the views from this direction.

Local Built Context

- 4.15 This is limited and of very variable quality. The site itself contains a former Tollgate Inn

building, a not unattractive "Mock Tudor" style building angled so as to have once faced the road and having two wings out to the north and west, the northern wing extending to the site's boundary. The Tollgate Inn was a typical roadhouse of the fifties. Views on site are shown on **Photosheet 1 and 2**. The central part of the building has a maximum ridge level of 52.49m AOD with the tallest chimney reaching 54.54m AOD. The general ridge level of both the northern and western wings of the building are at about 48.00m AOD and the existing frontage forecourt level is 41.80m AOD.

- 4.16 The substantial balance of the extant buildings on the site includes the former motel, set to the rear, eastern side, of the above building. This is a two-storey flat roofed building of very poor visual appearance and run down state of repair that steps up the rising ground along the northern boundary with a wing returning south, close to the eastern boundary. Being at the highest part of the site, this wing is quite prominent in views from the lower lying roundabout to the west. The northern arm of this building steps up having ridge heights rising from 49.57m AOD to 53.22m AOD. The southern arm of the motel, that runs close to the eastern boundary has a roof height generally at about 53.25m AOD above a ground level of about 48m AOD.
- 4.17 The remaining balance of the site comprises two other single storey buildings, former parking areas and the recently cleared garden area with a sunken, paved area.
- 4.18 On the northern side of the former A2 alignment is an existing petrol filling station and shop, now isolated at the end of a no through road, whilst residential development closely abuts this to the north and east and at a higher level than the site. No other built form is close by save for the heavily engineered infrastructure of the new A2 bridge over Wrotham Road and the CTRL further south.
- 4.19 West of Wrotham Road and built in the former road corridor, is Cyclopark, an activity attraction that provides cycling, running and extreme sports facilities and which has been enlarged in the period between 2012 and 2018. The extensively glazed building and large car park is set on rising ground on the western flank of the coombe. Part of the riding circuit formerly overlooked the site but is now just screened by planting.
- 4.20 North of the old A2 alignment, within the urban area is a Morrisons supermarket, and a restaurant on Coldharbour Road, with land in between occupied by a Lidl supermarket and other industrial services buildings developed in recent years. Other development appears to be of mainly residential scale and is largely two storeys, although the Travel Lodge remains locally prominent with its undistinguished rectangular shape, north of the car park to Cyclopark.
- 4.21 The built character of the area is unremarkable and lacking in any particular visual merit.

On site vegetation

- 4.22 Other than a section of common laurel hedging and a small group of trees in the south eastern corner, there is no visually significant vegetation within the body of the site. However, part of scrubby broadleaved woodland cover to the north west of the site has

‘encroached’ into the site.

Offsite vegetation

- 4.23 Most of the off-site vegetation in the immediately adjacent area has been relatively newly planted at the time of our first visit in 2012, resulting from the landscape treatment of the former A2, the planting carried out to screen the new A2 and the planting forming part of the CTRL mitigation work.
- 4.24 This planting has now grown on and is making a more positive contribution to the locality, including screening further the existing site and its buildings from the new A2 and many other locations.
- 4.25 The planting immediately to the north of the site on the former A2 is formed of substantial areas of thicket and hedgerow style planting that is starting to contribute to the local appearance and marrying in with longer established planting along the former roadside.
- 4.26 To the south, the embankments to the elevated A2 are extensively planted. This planting has started to form a wooded backdrop to the site, screening the traffic from view but also screening most of the site from the overlooking A2, with the exception of a short section of the slip roads where some transient views are possible due to the minimal planting in this location. Most of the newer planting is native broadleaved material and includes hawthorn, hazel, dogwood, ash and some oak and field maple.
- 4.27 The extensive areas of new planting have started to have the effect of containing the site between the former A2 and the new A2. It is considered that only three or four houses in the ‘triangle’ between the ramp leading to Old Watling Street and Old Watling Street, north of the former A2 retain some, reduced overlooking views. There is however, a more open east - west axis along the line of the land left between the two road alignments.

Public Rights of Way (PRoW)

- 4.28 There is a limited PRoW network in the area. However, as already noted, the regional recreation route of the Wealdway passes the site, utilising the reshaped route afforded by the former A2. There are limited intermittent viewing opportunities from the Wealdway, with the rooftops of the former Tollgate Inn only becoming visible on closer approach to the site. In addition to Wealdway walkers, the route is used by many others as the corridor is part of National Cycle Route (NCR) 177 which follows the old Watling Street alignment. There are footpath links into the urban area on its route eastwards, with the closest footpath (NG23) adjoining NCR 177 at the entrance to the Cyclopark car park.

Landscape Designations

- 4.29 There are no designations relating to landscape quality relevant to the site.

Ancient Woodland

- 4.30 There is no recorded ancient woodland in proximity to the site.

Open Access Land

- 4.31 There is no Open Access Land in proximity to the site, the nearest being Jeskyns Country Park, over 2km to the south east of the site.

Cultural Heritage Designations

- 4.32 There are no conservation areas, historic parks or gardens or Listed Buildings of relevance to the site.

Visibility

- 4.33 The previous landscape and visual assessments in 2012 and 2018 indicated that the site was fairly well contained in its local setting. Since 2018, the site has become further visually contained due to vegetation growth (i.e. when looking from north of the site from the ramp leading to Old Watling Street), as well as the construction of the new commercial development to the north west of the site, between the Travelodge and the Morrison Supermarket, that has cut off the visibility of the site from Coldharbour Road to the north west.
- 4.34 A Primary Visual Envelope (PVE) has been prepared (PVE 2024 on **Figure HBA 4**) and indicates those parts of the surrounding area from where it is considered that views of the proposed development are most likely to be possible. Not all areas within the PVE will be exposed to views, similarly there may be other locations outside the PVE that may have views, but on the basis of the site inspections and the extensive maturing planting associated with the A2 and CTRL corridors, these are not considered to be significant. No buildings have been accessed as part of the visibility appraisal.
- 4.35 For comparison, the PVE from the previous assessments in 2012 and 2018 has been shown on **Figure HBA 4**, together with the current PVE, to illustrate the direction of change in the landscape setting and visibility of the proposed development site in recent years, the extent of the PVE decreasing over time.
- 4.36 The PVE is most obviously influenced by landform, both natural and engineered, and as noted above will continue to be further influenced, and limited, by the maturing planting in the area, whilst built development to the north essentially prevents further views from that direction.
- 4.37 From the south, there is a glimpsed view onto the site available from the elevated section of the A2 above Wrotham Road but once passed, the established planting on the embankment of the A2 screens most of the view.
- 4.38 In views from the west, from the immediate vicinity of the Tollgate roundabout, the increased local prominence of the higher eastern part of the former motel site occupied by a wing of the redundant motel, can be noted. From the Tollgate roundabout, there is a wide and open view onto the former motel and the former Tollgate Inn building. This could have been partially screened by the trees planted within the roundabout, however,

there is notable loss in the tree planting, and most of the remaining trees here show low vitality and poor growth (**Viewpoint 1 Photosheet 3**). As the roundabout is offsite and the trees within provide minimal contribution to the site's setting and screening, they have been discounted from the assessment. Whilst the views from the immediate vicinity of the Tollgate roundabout are considered only of local importance, it should be noted that due to its location at the entrance to Gravesend, nonetheless should be regarded as something of a local gateway location.

- 4.39 To the south west the site would remain in view from the east bound off slip road as it descends to the roundabout opposite the site (**Viewpoint 2 Photosheet 4**). Similarly, the site would remain in view from the eastbound on slip road at the site boundary, and as such it is considered that views from this location could contribute to the 'local gateway' approach.
- 4.40 To the north west from the A227 roundabout opposite the site (on the new alignment of the Wrotham Road), the site is becoming increasingly screened by the surrounding trees, especially when trees are in leaf, with only the roofs and chimneys of the former Tollgate Inn building visible above the treetops (**Viewpoint 3 Photosheet 5**).
- 4.41 To the north and north east, the nearby urban edge, augmented by some of the mounding and maturing planting on the former A2, mean that viewing opportunities are relatively limited and are decreasing over time, for example limited views are available from the footpath ramp leading to Old Watling Street with only a fraction of the former Tollgate Inn roof being visible above the establishing vegetation, from a close distance from part of the lower end of the ramp. (**Viewpoint 4 Photosheet 6**). Vegetation growth to the former A2 corridor will further reduce the availability of views in this direction.
- 4.42 To the north, standing on the Wealdway/NRC 177, looking south west towards the site, part of the former Tollgate Inn comes into view from an estimated distance of 70m from the footpath barrier near the site. The former Tollgate Inn becomes more exposed as the receptors (ie people using the recreational route) get closer to the site. Near the footpath barrier the former Tollgate Inn is locally prominent beyond the hoarding fence surrounding the site. (**Viewpoint 5 Photosheet 7**). Visibility is expected to decrease further as the vegetation along the northern site boundary increases in height.
- 4.43 To the north the former Tollgate Inn building is apparent, especially its roof, in the view south along the old stretch of Wrotham Road (**Viewpoint 6 Photosheet 8**).
- 4.44 Moving north west further away from the site, the roof of the former Tollgate Inn building is visible looking east from the top of public footpath NG23, where the path adjoins NCR 177. (**Viewpoint 7 Photosheet 9**). However, this is only a pinpoint location as the view becomes screened along most of NG23 due to the footpath's levels reducing.
- 4.45 Further west, the view from the tracks at Cyclopark towards the site is screened. The views east from the footpath /NCR 177 route on the northern side of the Cyclopark car park onto the site are becoming increasingly screened with only the roof line of the former

motel building visible above the treetops. Further reductions in these views can be expected as the planting on the western side of the Tollgate roundabout continues to establish. (**Viewpoint 8 Photosheet 10**).

- 4.46 From the east the view of the site is very limited. One location is the Wealdway footbridge to the east from the site, above A2, where the back of the former motel building can be seen above a line of boundary hedgerow. From the east, the screening of the higher eastern boundary depends on the quality of the hedgerow. (**Viewpoint 9 Photosheet 11**).
- 4.47 From further north-west to Coldharbour Road, the upper part of the motel was noted as being quite prominent and stark in the 2012 assessment by HBA. This has mellowed over time, with the 2018 assessment observing significant vegetation growth leaving only the rooftops of the former motel visible. The view is now completely cut off by the buildings of the recently constructed commercial centre to the north west of the Travelodge.
- 4.48 On the basis of the PVE and visual analysis above, the treatment of the layout, form and height of development in the higher eastern part of the site is considered to be more sensitive than the lower part of the site, closer to the roundabout, provided the amenity of the "green corridor" is protected.

Landscape and Visual Detractors

- 4.49 As can be determined from the Gravesham Landscape Character Assessment, the area in which the former motel site lies has some significant detractors.
- 4.50 The main detractors are the A2 and the CRTL corridors with their associated infrastructure of signs, gantries and lighting. Pylons are also prominent. The noise and visual intrusion from rail and road traffic also inevitably detracts from any appreciation of the area. There is seemingly constant noise and movement. There is little or no tranquillity or sense of remoteness.
- 4.51 At the local level, the site itself has now lain derelict since it was used as a construction compound for the A2 realignment, and the higher motel part of the site is unattractive and locally prominent.
- 4.52 The remaining visual appeal of the balance of the area is also poor, the former road corridor still appearing as a left-over strip with large areas of former road surfacing noted, augmented by the poorly shaped artificial nature of many of the associated earthworks. These appear to have had an effect on the growth achieved in the planting carried out. This is an unfortunately typical trait of planting into poorly prepared 'engineered' ground. The presence of Cyclopark exerts an urban influence in views west with its building set at a crest in the landform and the extensive carpark with lighting on its eastern side tends to augment the urban fringe feel this area has where the development within the urban area is also prominent, with a Travel Lodge and Morrisons supermarket also prominent.
- 4.53 The truncated Wrotham Road serving the PFS is also an obvious relic of the former road alignment and, as a result, is somewhat out of scale and character with its surroundings

and set with the elevated backdrop of housing above the former roadside retaining wall with its long pedestrian ramp emphasising the scope of changes made to the local landscape over many years from various highway modifications.

Landscape Condition

- 4.54 Landscape condition (or landscape quality) is defined in the GLVIA3 glossary as being:

“A measure of the physical state of the landscape. It may include the extent to which typical character is represented in individual areas, the intactness of the landscape and the condition of individual elements.”

- 4.55 For the purposes of this assessment, based on the information set out above that forms the landscape baseline for the site and its setting, including the Gravesham Landscape Character Assessment and our site inspections, the landscape condition of the locality in which the site lies can be ranked as poor / low condition. In relation to the site itself, its landscape condition as it currently stands (**Basis 1**), can only be ranked as **very poor**. It is a completely disturbed/fragmented landscape.

Landscape Value

- 4.56 Landscape value is defined in the GLVIA3 glossary as being:

“The relative value that is attached to different landscapes by society. A landscape may be valued by different stakeholders for a whole variety of different reasons.”

- 4.57 Relative value is thus something that will be different for different people. Typical attributes or components that may help to determine the ranking of value are set out in **Appendix 1, Table 2**.

- 4.58 For the consideration of landscape value, the site’s location within the Metropolitan Green Belt has been ignored, as Green Belt is not a designation that relates to landscape per se (for Green Belt considerations refer to chapter 7).

- 4.59 Whilst NPPF does not define “valued landscapes”, it is acknowledged, and established by case law, that value is not merely something that is designated either by statute, such as National Parks or National Landscapes, or non-statutory process.

- 4.60 GLVIA3 notes at 5.19, where the valuing of the landscape is addressed that: “A review of the existing landscape designations is usually the starting point in understanding landscape value, but the value attached to undesignated landscapes also needs to be carefully considered and individual elements of the landscape – such as trees, buildings or hedgerows – may also have a value. All need to be considered where relevant”.

- 4.61 GLVIA3 discusses the value of undesignated landscapes further from paragraph 5.26, noting that: “The fact that an area of landscape is not designated either nationally or locally does not mean that it does not have a value..... The European Landscape Convention promotes the need to take account of all landscapes, with less emphasis on the

special and more recognition that ordinary landscapes, also have their value, supported by the landscape character approach.”

- 4.62 In this instance, the landscape is not designated at a national or local level in terms of its value.
- 4.63 The assessment of landscape value should take account of the advice set out in GLVIA3 and it may be appropriate to have regard to the factors identified in Box 5.1, Page 84, listed as *“range of factors that can help in the identification of valued landscapes”*. Since GLVIA3 was published in 2013, appeal decisions, high court judgements and practitioners’ experience have provided further information about the factors which can be considered in assessing landscape value outside nationally designated landscapes. The Box 5.1 criteria have therefore been updated and refined in LI TGN 02/21 ‘Assessing landscape value outside national designations.
- 4.64 The updated criteria (Table 1 TGN 02/21) cover the headings of:
- *Landscape Condition;*
 - *Perceptual (scenic);*
 - *Distinctiveness;*
 - *Natural heritage*
 - *Cultural heritage;*
 - *Recreational;*
 - *Perceptual (scenic);*
 - *Perceptual (wildness and tranquillity)*
 - *Associations.*
 - *Functional*
- 4.65 As noted above, it is considered that the **landscape condition** of the site’s surrounding countryside is of poor / low condition, the site itself being very poor.
- 4.66 In terms of **perceptual (scenic) quality**, the inherently unattractive nature of the extensive infrastructure features in the area are significant detractors and, as noted in the Gravesham Landscape Assessment, the strongest feature is the landform, but at the site this has been heavily modified. Whilst establishing vegetation is softening some of the harshest effects / elements noted in the area, it remains an area of little scenic quality, notwithstanding the existence of some long distance views.
- 4.67 As the site is part of a disused motorist’s roadside facility with an associated disused motel, it does not form part of a **distinctive landscape**. Lying at the settlement edge on a secondary but nonetheless important approach to Gravesend and showing the sort of ‘urban fringe’ pressures that can often be found in such situations, the site currently makes no contribution to landscape value on either count of rarity or representativeness.

- 4.68 In terms of **natural heritage**, in ecological terms it is understood that no bats were observed emerging from or re-entering the existing buildings and very limited commuting and foraging activities were observed. With the exception of hedgehog, no habitat was considered particularly suitable for other protected species or species of principal importance within the site. The site lies in a green corridor that is shown in Core Strategy Figure 19 to be a Biodiversity Opportunity Area. It has the potential to provide habitat connectivity in the area.
- 4.69 There is no direct **recreational** use or potential use arising from the site in its current state. Its seemingly derelict and unattractive appearance, behind security fencing / hoarding, detracts to some degree from the indirect recreational amenity of users of the local rights of way network including the regionally important Wealdway.
- 4.70 The **perceptual (wilderness and tranquillity)** aspects for the site and its local urban edge and contained context, seemingly cut off from what is perceived to be 'open countryside' is of little value, largely for the reasons set out above in relation to scenic quality and representativeness.
- 4.71 There is no known **cultural heritage** value or association linked to the site or its local context save for its location along the historic line of the now much modified Watling Street. No **associations** of the site with notable people, events and the arts have been identified.
- 4.72 The site is located along a green corridor. However, as the site is currently occupied by disused derelict buildings, associated hard surfacing and minimal vegetation, surrounded by visually unsightly hoarding fence, as such its contribution towards the healthy **functioning** of the surrounding landscape is limited. The previous site function as a motorists facility is inactive. Considered in the round, it is concluded that the **landscape value** of **Basis 1** the former motel site is considered to be **poor** (**Appendix 1, Table 2**)
- 4.73 The site merits being given no weight in the consideration of "valued landscape" referenced in the NPPF.

5 THE REDEVELOPMENT PROPOSAL

- 5.1 The proposed motorists service station, that is the subject of the planning application and the subject of this LVA, is to function as an electric vehicle charging hub and is summarized as:
- Provision of 24 Electric Vehicle charging bays and supporting electrical infrastructure (12 charging upstands, three substations and two network cabinets);
 - Erection of a single storey forecourt shop/amenity building (similar to a petrol filling station) with wraparound canopy and sedum green roof;
 - Erection of six petrol/diesel fuel pump islands, with a canopy above and fuel storage tanks below to the rear of the amenity building;
 - Provision of two air and water bays;
 - Provision of customer parking to the front on the retail/amenity building;
 - Construction of vehicle access and circulation areas, with access to the site via the existing (albeit improved) crossover;
 - Provision of supporting infrastructure such as a sub-station and plant room; and
 - Perimeter landscaped areas, including new trees, to provide a soft interface between the development proposal and its wider context.
- 5.2 The proposal would demolish and clear away all the existing buildings on the site.
- 5.3 The redevelopment would be in the central and western parts of the site and is shown on the drawings forming a part of the application.
- 5.4 The Proposed Site Elevations (BP drawing number: EV005-PS-LAY-000-GB00015044-0004-001 Rev B01, MBH drawing number 14170-23 Rev F) supporting the application are helpful in explaining the proposal in terms of the building heights and level changes proposed. The general level of the forecourt and circulation area are proposed to be lowered so that they would rise very gradually from about 41.5m AOD on the western side to 43.0m AOD on the eastern side. This would result in an approximate cutting of 3.5m deep along the eastern edge of the development's hard surfaced area.
- 5.5 The level reduction across the proposed forecourt and circulation areas allows for the new canopies and forecourt shop being set considerably lower than the existing buildings. The top of the canopy over the petrol/diesel fuel pumps would be at about 48.7mAOD whilst the roof of the sales building would be at about 48.0m AOD. The top of both the sales building and the canopy would thus be significantly lower than the highest elements of the existing buildings on site.
- 5.6 The canopy and the forecourt shop would be finished in brick (of a local brick type) and incorporate the standard BP house style and colours. The sales building roof will be covered with a sedum roof.

- 5.7 There is an intention to locate two BP house style signs, subject to consent to advertise. One sign to be located on the western side of the MSS intended to be visible on approach to the facility and the second at the eastern and of the southern site boundary. Both signs are proposed to be 7.5m high. These have been assumed to be present for assessment purposes.

Landscape Strategy

- 5.8 The landscape strategy for the redeveloped site has been developed together with the engineering proposals as the scheme has evolved and is an integral part of the proposed MSS scheme. The strategy is illustrated on the Landscape Strategy Plan (drawing HBA-664-002 Rev C, provided at **Figure HBA 5**) and the BNG Strategy (drawing HBA-664-001 Rev D, provided at **Figure HBA 6**).
- 5.9 The landscape strategy has also been informed by the range of guidelines and landscape recommendations in the various published landscape character studies. Notably, the SEO for NCA 13 North Kent Plain and as set out in relation to the Gravesend Southern Fringe Local Landscape Character Area in the Gravesham Landscape Character Assessment.
- 5.10 The landscape strategy includes:
- Creation of a new landscape identity for the redeveloped site having regard to its gateway location.
 - Integration of the redeveloped site into the surrounding landscape by means of introduction of landforms and planting.
- 5.11 The key aspects of the strategy include:
- Tree planting to the western side of the forecourt, intended to filter views from the A2 slip road and the roundabout towards the development.
 - Native trees and scrub planting on the sloping strip along the southern boundary and to the northern boundary, transitioning to the west into woodland planting.
 - A native mixed hedgerow planted on the top of the proposed slope along the eastern boundary, and the top of the gabion wall, acting together with the tree planting on the western side of the development as a buffer and transition into the adjacent landscape.
 - New semi-improved grassland on the slope of the reprofiled landform between the areas of proposed woodland and scrub planting at the south-eastern and north-eastern corner of the site.
 - Native climbers to the top and bottom of the proposed gabion retaining wall along the northern boundary to maximise planted areas.
 - Sedum roof on top of the sales building, to maximise green areas and help water attenuation.
- 5.12 It has been assumed that, should the planning application receive planning approval,

planning conditions could be included in relation to the preparation of hard and soft landscape details, specifications, and the preparation and implementation of a long-term Landscape and Ecological Management Plan (LEMP) for the site as a whole. A Habitat Management and Monitoring Plan (HMMP) would be provided to identify how the landscape will be managed to create and enhance habitats and managed and monitored to ensure BNG is delivered.

- 5.13 Some lost and dying trees at the roundabout at the site frontage were noted, however the roundabout is offsite, and therefore is not included in the landscape proposals. The replacement of the lost or poor trees, whilst not essential to achieve landscape or visual mitigation, is seen as an additional opportunity for enhancement to the approach to Gravesend in this location. It is recommended that agreement to replace those trees is given by the applicant. This would also need agreement with the Highways Authority.

Indicative Planting Palette

- 5.14 Proposed examples of native plant species that could form the potential planting list for a detailed proposal are set out below:

Individual tree planting or small tree groups:

- Acer campestre var., Alnus sp. Betula pendula, Carpinus betulus, Prunus avium, Sorbus aria, Tilia cordata, Tilia platyphyllos (Tilias to be planted away from parked cars).
- Indicative sizes: Within beds directly adjacent to the forecourt building and the canopy above the petrol filling points older trees to be planted in the size range from Standard, 3x, girth 16-18cm, min height 4.5m to Semi mature, 4x, girth 25-30cm, min height 4.5m. Within beds around the site's perimeter, a mix of slightly younger trees to be planted, 50% of the trees in size Standard, 3x, girth 16-18cm, min height 4.5m, and another 50% in size range Standard, girth 12-14cm to 14-16cm, min height 3.5m.

Proposed woodland and scrub planting:

- Acer campestre, Corylus avellana, Malus sylvestris, Sorbus aria, Tilia cordata
- Indicative size range: Transplants, 1+1 – 1+2, height 40-60cm to 60-80cm
- Indicative density: Plants to be planted in wavy lines in groups of 3, 5 and 7 of the same species, spaces 2 and 3m centres, varying across the planted area.

Proposed native mixed hedgerow:

- Carpinus betulus, Corylus avellana, Crataegus monogyna, Prunus spinosa, Malus sylvestris, Sambucus nigra, Quercus petraea
- Indicative size range: Transplants, 1+1, height 60-80cm – 1+2, height 90-125cm
- Indicative density: 5 plants/m, planted in two staggered rows at 40cm centres.

Proposed native mixed scrub planting:

- Crataegus monogyna, Euonymus europaeus, Prunus spinosa, Dog rose, Sambucus nigra, Viburnum lantana.
- Indicative sizes: 1 + 1 – 1 + 2, height 40-60cm to 60-80cm
- Indicative density: Plants to be planted in single species groups of 3, 5 and 7 at 2 to 2.5m centres spacing.

Proposed ground cover:

- Vinca sp. Hedera sp., Ajuga sp.
- Indicative sizes: 1 or 2l containers
- Indicative density: 6 – 8 plants / m²

Assumed Growth Rate of Planting

- 5.15 It should be noted that, the actual growth rate and height of plants vary depending on the species, ground conditions and other environmental factors. However, for the purpose of this assessment and the accompanying photomontages, an approximate 0.2m to 0.3m growth per year has been assumed. This is considered to represent a 'worse case' for assessment purposes.

6 LANDSCAPE AND VISUAL EFFECTS ASSESSMENT

- 6.1 For the purpose of the assessment of the redeveloped site for the MSS proposal (**Basis 1**), this is made on the basis of the complete demolition and removal of all the existing buildings on the site and reduction of existing ground levels in the eastern part of the site, with the associated bank profiling around the northern, eastern and southern perimeter of the site, all as shown on the application plans.
- 6.2 As noted above, the assessment of the landscape and visual effects of the proposed redevelopment as the MSS is made against a comparison of the site in its current unused / defunct form (**Basis 1** – BP Drawing No: EV005-PS-LAY-000-GB00015044, MBH DRAWING NO: 14170-SAC EX, in HBA Appendix 4, extract in LVA Report Figure 1 above) and the site recommissioned / adopted and returned to hotel use with most buildings retained (**Basis 2** - Drawing No 8311-LRW-ZZ-00-DR-A-00-100 extract in LVA Report Figure 2 above), and against the site returned to hotel use with the former motel building demolished and replaced with a new building in place of the northern wing of the demolished motel (**Basis 3** - Drawing No 8311-LRW-ZZ-00-DR-A-00-102, extract in LVA Report Figure 3 above). Basis 2 and Basis 3 are the applicant's fall-back position in the event that planning permission is not granted.
- 6.3 The assessment considers the temporary nature and extent of effects on the landscape and views at the construction phase of the redevelopment of the MSS, in winter at "Day 1", and in summer at Year 15 after opening.

Landscape Effects

- 6.4 Landscape susceptibility is defined in the GLVIA3 glossary as:

"The ability of a defined landscape or visual receptors to accommodate the specific proposed development without undue negative consequences."

- 6.5 In terms of the site's susceptibility, the proposed replacement of a disused motorist's facility occupying the majority of the site with the MSS is considered to be of low susceptibility.
- 6.6 The baseline section concluded that the site has a poor landscape value. This, together with its low susceptibility, as shown in **Appendix 1, Table 7**, indicates that the landscape sensitivity of the site is to be regarded as **low**. This is considered to apply for the MSS and for Basis 1 and Basis 2.

Landscape Effects - Construction Phase

- 6.7 As part of MSS construction works, there would be a temporary negative impact of the increased road traffic, resulting in noise and dust from demolition of all the buildings and cart away operations to reduce levels to accommodate the proposed redevelopment. There will be cranes in view as well as other construction machinery, construction traffic and signage associated with the works. This is considered to give rise to medium adverse magnitude of landscape effect (**Appendix 1, Table 4**), due to its temporary character and

minimum / low sensitivity, resulting in **slight adverse** importance of landscape effects during construction phase for the MSS scheme (**Appendix 1, Table 8**).

- 6.8 For the **Basis 2** fall-back position, there would be a range of refurbishment works, vegetation clearance around the perimeter of the site, fencing and such like. It would be anticipated that some hard surfaced areas would require breaking out and disposal of site prior to resurfacing. With reference to **Appendix 1, Table 4** this is considered to be minimal adverse change in magnitude of landscape effects, resulting in **no to minimal adverse** importance of landscape effects during construction phase for the Basis 2 (**Appendix 1, Table 8**).
- 6.9 For the **Basis 3** fall-back position, there would be cranes and other construction machinery, temporary noise, dust and traffic increase due to the demolition works of the motel building followed by construction works of the new building. No significant changes to the ground levels are anticipated for the Basis 3. With reference to **Appendix 1, Table 4**, and due to its temporary nature, this was identified as low adverse change in magnitude of landscape effects, resulting in **minimal / slight adverse** importance of landscape effects during construction phase for the Basis 3 (**Appendix 1, Table 8**).
- 6.10 In summary it is considered that the construction phase for the MSS redevelopment would result in **slight adverse** importance of landscape effects, the Basis 3 fall-back position would result in **minimal/ slight adverse** importance of effects, and the Basis 2 would result in **no / minimal** importance of landscape effects that would be adverse during construction phase.

Landscape Effects - Redevelopment at Day 1

- 6.11 The proposed **MSS** scheme would bring a disused site back into use replacing an unattractive and derelict motel site with a modern electric vehicle charging facility with reduced built form. Whilst the reduction in levels would help to further embed the redevelopment into the landscape, which would be beneficial, the level reduction further compromises the already heavily modified local landform. However, there would be a locally worthwhile landscape benefit in removing buildings from the higher eastern part of the site and the reinstatement of this area to 'open landscape'. On balance and with reference to **Appendix 1, Table 4**, this is considered to broadly equate to a minor / moderate introduction of one or more key elements / features / characteristics of the baseline ie. predevelopment landscape and /or introduction of elements that are not uncharacteristic with the surrounding landscape. By reference to **Appendix 1, Table 4** the magnitude of the landscape effect resulting from the proposed redevelopment is therefore considered to be **low to medium** and **beneficial**.
- 6.12 The importance of landscape effect, which is derived from a consideration of the magnitude of landscape effect and the landscape sensitivity (low), is therefore considered to be between **minimal/slight to slight beneficial** (**Appendix 1, Table 8**) for the MSS scheme at Day 1. This benefit could be expected to increase over time as any planting further establishes.

- 6.13 For the **Basis 2** fall-back situation at Day 1, there would be no landscape benefit arising from building removal and the buildings would be slightly more prominent, particularly in the higher eastern part of the site as a result of localised vegetation clearance. There would be minor benefits, as noted above, resulting from the buildings being refurbished and brought back into use and the removal of security fencing. However, considered in the round, the magnitude of landscape effect is ranked as minimal adverse at Day 1 for the Basis 2 fall-back situation (**Appendix 1, Table 4**). Thus, the importance of the landscape effect is considered to be **minimal adverse** (**Appendix 1, Table 8**). This result would be unlikely to change over time.
- 6.14 For the **Basis 3** fall-back position at Day 1 there would be a minor landscape benefit in removing the derelict motel building, standing in the highest eastern part of the site, and positioning a new one of a smaller footprint on the northern side. However, the benefit would be reduced by the car park introduced in the higher part of the site. On balance, it is considered that the Basis 3 fall-back position would result in a **minimal to low beneficial** magnitude of landscape effects at Day 1 (**Appendix 1, Table 4**). Thus, the importance of the landscape effect is **no effect to minimal/ slight beneficial** (**Appendix 1, Table 8**).
- 6.15 In summary, at Day 1, a **minimal/slight to slight beneficial** importance of landscape effects would be likely to arise from the MSS scheme, although the landscape effects of the Basis 1 and 2 are not significantly different.

Visual Effects

- 6.16 Relatively few public vantage points have been identified and the primary visual envelope is small and well defined (**Figure HBA 4**).
- 6.17 With regard to the susceptibility of visual receptors, GLVIA3 notes that it is common for users of public rights of way, whose attention is mainly focussed on the landscape, and for residents of properties exposed to views of the site, to have high susceptibility. In this instance, the degree of susceptibility is considered to be reduced. This is because of the overriding lack of intrinsic quality in the area, the lack of tranquillity, and the transitional and artificial nature of the redundant section of the A2 corridor forming a fringe landscape at the urban edge. The southerly outlook is heavily impaired by elements of the A2 and the CTRL.
- 6.18 For all viewers, including residents, recreational users of the Wealdway and Cyclopark, but excluding vehicle travellers, visual susceptibility has been ranked as **medium**. For vehicle travellers on the A2 and Wrotham Road, Cyclopark and on the access to the Shell Service Station etc, visual susceptibility is considered to be somewhat reduced and, in this instance, has been ranked as **low**.
- 6.19 In terms of the value of the views, no views have been found that are identified on maps or books as being acknowledged to be of particular value and there are no local prominent focal points or listed buildings in which the proposed redevelopment would be seen. The landscape is undesignated. However the site lies at something of a local gateway location

to the Gravesend urban area. Thus, for this assessment, the value of all views has been ranked as **medium / low** (Appendix 1, Table 5).

- 6.20 Resulting from the medium receptor susceptibility and the medium/ low value of views that has been adopted for the assessment, the **visual sensitivity** for all receptors, other than vehicle travellers, is ranked as **medium**. For vehicle travellers the sensitivity is **low** (Appendix 1, Table 7).

Visual Effects - Construction Phase

- 6.21 The detailed phasing of construction is unknown and thus for assessment purposes, essentially only generic effect has been identified. None of the redevelopment scenarios is considered to involve any unusual or exceptionally disruptive activity. In any event, construction would be subject to a Construction Environmental Management Plan (CEMP) that would be agreed with the local authority as part of the planning process.

Visual Effects (Construction) - At the site's road frontage - Vehicle travellers – Viewpoint 1 (Sensitivity: Low)

- 6.22 Vehicle travellers on the roundabout are identified as one of the visual receptors at the site frontage. The demolition works, levels reduction to the existing ground and construction of new building and canopies, as well as an additional construction traffic impacting the regular traffic in this location and construction signage would create some temporary visual distraction to vehicle travellers, as compared to the current unused state of the site. The magnitude of visual effect for the **MSS** scheme at construction phase is considered to be medium and adverse (Appendix 1, Table 6) as the associated works would create a moderate effect on many viewers in this location. The ranking of the importance of visual effect resulting from a medium adverse magnitude of effect in a view of low receptor sensitivity for vehicle users is **slight adverse** (Appendix 1, Table 8) during the construction phase.
- 6.23 In the **Basis 2** fall-back situation, the visual change would be smaller, there would be no reduction in levels or demolition of buildings but there would be still some effect arising from construction vehicle movements, signs and lighting etc. The magnitude of visual effect for vehicle travellers is considered to be minimal to low and adverse in the construction phase, thus, on account of the low receptor sensitivity, the importance of visual effect is ranked as **no to minimal / slight adverse** (Appendix 1, Table 8).
- 6.24 In the **Basis 3** fall-back position the visual change would be greater due to the motel building demolition works and the activities within and near the site, due to construction works of the new building and other related ground level works, including car park construction visible at the highest part of the site.
- 6.25 For vehicle travellers (low sensitivity) the magnitude of visual effects is considered to be **low to medium adverse** (Appendix 1, Table 6), the resulting importance of visual effects in the construction phase is assessed as **minimal/ slight to slight adverse** (Appendix 1, Table 8).

Visual Effects (Construction) - At the site's road frontage - Pedestrians and Cyclists – Viewpoint 1 (Sensitivity: Medium/Low)

- 6.26 For pedestrians / cyclists at the site frontage roundabout, because of their medium sensitivity, the magnitude of visual effect for the **MSS** scheme is considered to be medium adverse as the disturbance from the construction operations would be clearly noticeable by those receptors, with the resultant ranking of the importance of visual effect to be **moderate adverse (Appendix 1, Table 6)** at the construction phase for the MSS scheme (**Appendix 1, Table 8**).
- 6.27 In the **Basis 2** fall-back situation, for pedestrians / cyclists the magnitude of visual effect is considered to be minimal to low and adverse as the external construction works are expected to be limited mainly to the elevation refurbishment and hard and soft landscape works. The remaining part of works would be screened within the buildings. The minimal to low adverse magnitude of visual effects would give rise to an importance of visual effect that is considered to be **no /minimal to slight adverse** in the construction phase for pedestrians and cyclists (**Appendix 1, Table 8**).
- 6.28 In the **Basis 3** fall-back situation, for pedestrians / cyclists the magnitude of visual effects is considered to be low to medium adverse (**Appendix 1, Table 6**) in the construction phase, as the demolition of the former motel building and construction works of the new building would create minor disturbance resulting from the works, at the site's road frontage for these receptors. It is considered that the low to medium adverse magnitude of visual effects together with the medium sensitivity of these receptors would give rise to **slight to moderate** adverse importance of visual effects (**Appendix 1, Table 8**).

Visual Effects (Construction) - Vehicle travellers on the A2 and the A2 slip roads etc – Viewpoint 2 and 3 (Sensitivity: Low)

- 6.29 For vehicle travellers on the A2 and the A2 slip roads accessing the roundabout with Wrotham Road, and for users of the Wrotham Road from where the site can be seen, other than from the frontage, the magnitude of effect would range from minimal at Viewpoint 3 to low adverse at Viewpoint 2 for the construction phase of the **MSS** scheme. For these receptors, the construction works associated with the redevelopment would be readily discernible in a large proportion of these views. Thus, the resultant importance of visual effect would range from **no effect to minimal / slight adverse** during the construction phase for the MSS scheme (**Appendix 1, Table 8**).
- 6.30 In the **Basis 2** fall-back situation, the magnitude of visual effect on vehicle travellers is considered to be almost none at Viewpoint 3 and minimal adverse effect at Viewpoint 2, which for a receptor of low sensitivity, results in an importance of visual effect that would be **no effect** during the construction phase (**Appendix 1, Table 8**).
- 6.31 In the **Basis 3** fall-back situation, the magnitude of visual effect on vehicle travellers is considered to be from no/minimal at Viewpoint 3 to low adverse at Viewpoint 2. For these receptors, the construction works associated with the Basis 3 option would be just

discernible in some proportion of these views. Thus, the resultant importance of visual effect would range from **no effect to minimal / slight adverse** during the construction phase for this option (**Appendix 1, Table 8**).

Visual Effects (Construction) - Receptors north and north-east of the site- Pedestrians, cyclists (and equestrians) - Viewpoint 4, 5 and 6 (Sensitivity: Medium Low)

- 6.32 Pedestrians, on the ramp leading to Old Watling Street (Viewpoint 4), pedestrians, cyclists (and equestrians) on the Wealdway / NCR 177 (Viewpoint 5) as well as pedestrians on the old alignment of Wrotham Road (Viewpoint 6) ,having medium sensitivity, as they pass to the north and north-east of the site would experience a **minimal adverse** magnitude of visual effect at an estimated distance of 70m measured from the footpath barrier near the site, with the effect increasing to **medium adverse** magnitude of visual effect as the receptors approach the site. This is due to the dense vegetation covering the mounds along the northern boundary, that from a distance screen the buildings on site. However, as the receptors get closer to the site, the former Tollgate Inn building becomes more visible. The dense vegetation terminates near to the former Tollgate Inn, where only sparse trees and shrub planting are present, opening a view to the former Tollgate Inn and hoarding fence of the site. After the demolition of the buildings, especially the former Tollgate Inn, the near view into the site would become more open. The construction activities and associated noise and dust are expected to be apparent as the receptors pass the site on the Wealdway/NCR 177 and the southern end of the old alignment of Wrotham Road. The resultant importance of visual effect for pedestrians, cyclists (and equestrians) is thus considered to range from **no/minimal to moderate adverse** during construction phase of the MSS scheme (**Appendix 1, Table 8**).
- 6.33 In the **Basis 2** fall-back situation, for pedestrians, cyclists (and equestrians), the magnitude of visual effect is considered to be no / minimal adverse effect, as the refurbishment and construction works would be of a significantly lower scale. There would be no demolition, no ground level reduction works, and the existing buildings would screen the majority of the works. Thus, for a receptor of medium sensitivity would result in the **no/minimal adverse** importance of visual effect during the construction phase of Basis 2 (**Appendix 1, Table 8**).
- 6.34 In the **Basis 3** fall-back situation, pedestrians, cyclists (and equestrians) would experience minimal to low adverse magnitude of visual effect, as the demolition of the former motel and the construction of the new building would create noise and would involve more machinery including cranes. The existing retained former Tollgate Inn building would screen the construction works to some extent, reducing the impact. Thus, for receptors of medium sensitivity the importance of visual effect would result in **minimal to slight adverse** importance during the construction phase of Basis 3 (**Appendix 1, Table 8**).

Visual Effects (Construction) - Receptors north and north-east of the site- Residents - Viewpoint 4 (Sensitivity: Medium Low)

- 6.35 For residents of the properties close to the Shell petrol station and the three or four

properties near the top of the ramp leading to Old Watling Street, north of the site who might have an overlooking view (Viewpoint 4), of the MSS scheme, the construction works would be noted in part of the site, as the vegetation on the raised banks outside of the site along the northern wing of the former motel building screen much of the site. Some of the construction activities may be seen and an increase in lighting would be noted. The demolition of the former Tollgate Inn building would open the view into the site. The magnitude of the visual effect is considered to be **low to medium adverse**. Thus, the importance of visual effect for the MSS scheme during the construction phase is considered to be **slight to moderate adverse** (Appendix 1, Table 8).

- 6.36 In the **Basis 2** fall-back situation, the existing buildings would screen most of the construction activities within the site, and they would generate less noise or dust. Lighting would be not as noticeable as in the MSS case as it would at least partly be screened by the existing buildings. The magnitude of visual effect is considered to be **minimal adverse**. Thus, the construction phase of the Basis 2 fall-back situation for these receptors would result in **minimal adverse** importance of visual effect (Appendix 1, Table 8).
- 6.37 In the **Basis 3** fall-back situation, the construction works would be notable only in part of the site, as the vegetation outside the northern boundary and the retained former Tollgate Inn Building would screen part of the site. The demolition and construction works are expected to be more notable than in the case of the Basis 2, however, they would be of a smaller scale than the MSS scheme. There would be less demolition and no changes to the ground levels in comparison to MSS scheme. The magnitude of the visual effect is considered to be **low adverse**. Thus, with the medium sensitivity of the receptors the importance of visual effect would result to be **slight adverse** during the construction phase (Appendix 1, Table 8).

Visual Effects (Construction) - View from the top of the PRow footpath NG23 - Viewpoint 7
(Sensitivity: Medium Low)

- 6.38 This is a pinpoint location, where the view of the site is available from the higher western end of the footpath. For the MSS scheme, Pedestrians on the footpath NG23 would notice the demolition and construction works. The view would be slightly filtered by the off-site vegetation along the NCR 177. Thus the receptors, ranked as having medium sensitivity at the top of the footpath, would experience a low adverse magnitude of visual effect for the MSS scheme during the construction phase. The resultant importance of visual effect is therefore considered to be **slight adverse** during the construction phase of the MSS scheme (Appendix 1, Table 8).
- 6.39 In the **Basis 2** fall-back situation, for pedestrians on this part of footpath NG23, the construction operations will be relatively small scale and most activity would be screened by the existing buildings and the off-site vegetation along the NCR 177. The magnitude of visual effect is considered to be minimal/no change in this location. Thus, the importance of visual effect is considered to be **no effect** for the Basis 2 fall-back situation during the construction works (Appendix 1, Table 8).

- 6.40 In the **Basis 3** fall-back situation, the construction works would be screened by the retained former Tollgate Inn and the vegetation along the NCR 177. Construction machinery may be notable above the roof level of the former Tollgate Inn building. On balance the magnitude of the visual effect is considered to be minimal adverse. Thus, with the medium sensitivity of the receptors, the importance of visual effect would be **minimal adverse** during the construction phase of Basis 3 (**Appendix 1, Table 8**).

Visual Effects (Construction) - Other Locations: On the eastbound approach from the vicinity of the Cyclopark building – Viewpoint 8 (Sensitivity Medium Low)

- 6.41 For Pedestrians, cyclists (and equestrians) on the eastbound approach from the vicinity of the Cyclopark building until reaching the vicinity of the green bridge over the A227/Wrotham Road, the view of the site and the demolition and construction works would become more apparent as the receptors get closer to the green bridge. However, the view of the site would be partially screened by the vegetation along the NCR 177. Therefore, the magnitude of visual effect would gradually rise from minimal to low adverse for the **MSS** scheme. It is therefore considered that the importance of visual effect for these receptors would range from **minimal to slight adverse** effect during the construction phase (**Appendix 1, Table 8**).
- 6.42 In the **Basis 2** fall-back situation, the majority of the works would be screened by the retained former Tollgate Inn. Therefore, the magnitude of visual effect is considered to be minimal/no change, resulting in **no/minimal** importance of visual effect during the construction works of the Basis 2 fall-back situation (**Appendix 1, Table 8**).
- 6.43 In the **Basis 3** fall-back situation in this location, most of the demolition and construction works would be screened by the retained former Tollgate Inn. Some activity such as cranes may be more noticeable as the receptors get closer to the green bridge. Therefore, it is considered that the magnitude of visual effect would gradually rise from none to minimal adverse for the Basis 3, thus the importance of visual effect for these receptors would range from **no effect to minimal adverse** effect during the construction phase of the Basis 3 fall-back position (**Appendix 1, Table 8**).
- 6.44 Similar rankings are predicted for these receptors for the **MSS** scheme, the Basis 2 and the Basis 3 fall-back positions, when east of the eastern boundary of the site on the westbound approach including from the Wealdway footbridge over the A2 (Viewpoint 9).
- 6.45 To summarise the construction phase of the **MSS** scheme, Basis 2 and Basis 3 fall-back positions, it is considered the **MSS** scheme would result in a slighter greater adverse importance of visual effects. This is due to all of the existing buildings being demolished followed by the operations related to the ground level changes and new construction works. However, these effects are only temporary and will last only for the duration of the construction phase.

Visual effects at Day 1

Visual effects (Day 1) - At the site's road frontage - Vehicle travellers – Viewpoint 1
(Sensitivity: Low) (Photomontage A)

- 6.46 Visual receptors at the site frontage are predominantly vehicle travellers on the roundabout, although some pedestrian / cyclist usage is evident. The forecourt building and canopies of the **MSS** scheme would be of lower height, set on lowered ground and positioned in the centre of the site and include a agreen roof finish to the forecourt building, and thus less prominent than the existing Tollgate Inn and the motel building. Although there would be an increase in vehicle movements, signs and lighting as compared to the current unused state of the site, the **MSS** scheme would be less prominent. Part of the site will be returned to the open landscape and new grassland areas with shrubs and areas of woodland planting introduced. The proposed semi-mature trees to the frontage of the forecourt building would provide only limited beneficial visual contribution at Day 1. There is an intention to position a BP sign in the western part of the site. The sign will be visible on approach to the site from the A2 slip road and Wrotham Road. On balance, the magnitude of visual effect for the **MSS** scheme is considered to be **low to medium** and **beneficial** (Appendix 1, Table 6) as the existing unused buildings and hoardings would be removed and replaced by the new, less extensive built form, set further back from the road and set lower in the landform.
- 6.47 The resulting importance of visual effect (from a low to medium beneficial magnitude of effect for low sensitivity receptors) is **minimal/slight to slight beneficial** (Appendix 1, Table 8) at Day 1 for the **MSS** scheme.
- 6.48 In the **Basis 2** situation for vehicle travellers, the visual change would be much smaller resulting from the buildings being refurbished and the hoarding fence removed. Additionally, there would be no reduction in the perception of built form and there would be some effect arising from an increase in vehicle movements, signs and lighting. The magnitude of visual effect is considered to be **minimal and beneficial** at Day 1 due to the appearance of the built form being uplifted. Thus, on account of the low receptor sensitivity, the importance of visual effect is ranked as **no effect** (Appendix 1, Table 8).
- 6.49 In the **Basis 3** fall-back situation for vehicle travellers, the visual change would be greater as the easternmost motel building would be removed and replaced with a new building of a smaller footprint. However, the introduction of a carpark with associated lighting columns would offset some of the benefit, as the car park would be visible due to its prominent location. The magnitude of visual effect for vehicle travellers at Day 1 is considered to be **minimal to low beneficial** (Appendix 1, Table 6). The importance of visual effect resulting from a minimal to low beneficial magnitude of visual effects is therefore **no effect to minimal /slight beneficial** (Appendix 1, Table 8) at Day 1 for the **Basis 3** fall-back position.

Visual Effects (Day 1) - At the site's road frontage - Pedestrians / Cyclists – Viewpoint 1
(Sensitivity: Medium) (Photomontage A)

- 6.50 For pedestrians / cyclists at the site frontage roundabout, the noticeable changes described for vehicular users, will be noted by these receptors. The receptors have medium sensitivity, and the magnitude of visual effect arising from the MSS is considered to be **low to medium beneficial**, the resultant importance of visual effect is therefore assessed as **slight to moderate beneficial** at Day 1 for the **MSS** scheme.
- 6.51 In the **Basis 2** fall-back situation the changes described for vehicular users will also be noted by pedestrians / cyclists. The magnitude of visual effect is considered to be **minimal beneficial**, with the receptors considered to have medium sensitivity, giving rise to an importance of visual effect that would be **minimal beneficial** at Day 1.
- 6.52 In the **Basis 3** fall-back situation, the changes described for vehicular users will also be noted by pedestrians / cyclists. The receptors have medium visual sensitivity and the magnitude of visual effect is considered to be **minimal to low beneficial**, giving rise to an importance of visual effect that would be **minimal to slight beneficial** at Day 1 (**Appendix 1, Table 8**)

Visual Effects (Day 1) – Vehicle travellers on the A2 and the A2 slip roads etc – Viewpoint 2 and 3 (Sensitivity: Low)

- 6.53 For vehicle travellers on the A2 and the A2 slip roads accessing the roundabout with Wrotham Road, and for users of the Wrotham Road from where the site can be seen, other than from the frontage, the reduction in the built form within the site due to removal of all the buildings and replacing them with the MSS scheme of a smaller scale, positioned on a lowered ground level, would be discernible from both Viewpoints 2 and 3. The magnitude of the visual effect would be expected to range from **minimal** at Viewpoint 3 to **low beneficial** at Viewpoint 2 for the **MSS** scheme. Thus, with the low sensitivity of this receptor, the resultant importance of visual effect is expected to be **minimal / slight beneficial** at Day 1 for the MSS scheme (**Appendix 1, Table 8**).
- 6.54 In the **Basis 2** situation, the magnitude of visual effect is considered to be none at Viewpoint 3 as the refurbishment of the retained former Tollgate Inn and the motel building are expected not to be noticeable. A **minimal beneficial** magnitude of visual effect is expected at Viewpoint 2 as the changes derived from the refurbishment of the buildings and removal of the hoarding fence, would be just discernible. For a receptor of low sensitivity, this results in an importance of visual effect that would be **no effect** at Day 1 (**Appendix 1, Table 8**).
- 6.55 In the **Basis 3** situation, the new building behind the refurbished former Tollgate Inn would not be noticeable from viewpoint 3 but it would be seen at Viewpoint 2. Therefore, very minor to minor benefit from reduction in the built form is predicted to be perceived by the vehicle travellers at Viewpoint 2. However, this benefit would be offset, as the southern wing of the demolished motel would not be returned to the open landscape but replaced with an extended car park. On balance, the magnitude of visual effect would range from **none** at Viewpoint 3 to **minimal to low beneficial** at Viewpoint 2 for the Basis 3 situation.

Thus, the resultant importance of visual effect for receptors of low sensitivity would be **no effect to minimal / slight beneficial** at Day 1 for the Basis 3 situation (**Appendix 1, Table 8**).

Visual Effects (Day 1) - Receptors north of the site - Pedestrians, cyclists (and equestrians) Viewpoint 4, 5 and 6 (Photomontage B)

- 6.56 Pedestrians on the ramp leading to Old Watling Street (Viewpoint 4), pedestrians, cyclists (and equestrians) on the Wealdway / NCR 177 (Viewpoint 5) as well as pedestrians on the old alignment of Wrotham Road (Viewpoint 6), as they pass to the north and north-east of the site, are expected to experience **minimal** magnitude of effect at an estimated distance of 70m from the footpath barrier near the site. However, the visibility increases as receptors approach the site, the magnitude of visual effects is predicted to increase to low beneficial. This is due to the Tollgate Inn and unsightly hoarding being removed. The **MSS** buildings would be less visible as they will be set back from the boundary towards the centre of the site and set at lower levels. The MSS will have no fencing, and semi mature trees will be planted in the western part and along the site boundary that will contribute to the 'greener' appearance of the site from Day 1 and soften the view. For the MSS scheme the resultant importance of visual effect for pedestrians, cyclists (and equestrians), ranked as having medium sensitivity, on the Wealdway, as they pass to the north of the site, is considered **to range from minimal to slight beneficial** importance of visual effects at Day 1 (**Appendix 1, Table 8**).
- 6.57 In the **Basis 2** fall-back situation, pedestrians, on the ramp leading to Old Watling Street (Viewpoint 4), pedestrians, cyclists (and equestrians) on the Wealdway / NCR 177 (Viewpoint 5) as well as pedestrians on the old alignment of Wrotham Road (Viewpoint 6), as they pass to the north and north-east of the site, would note no change to the built form. It is expected that the hoarding fence would be removed. As the site would be operating, some vehicle movement and an increase in lighting may be observed. It is considered, the magnitude of visual effect for pedestrians and cyclists would range from **no/minimal beneficial to low beneficial** effect as the receptors get closer to the site due to refurbishment of the building becoming more noticeable. Thus, for a receptor of medium sensitivity the importance of visual effect would result in **no/minimal to slight beneficial effect** at Day 1 for the Basis 2 fall-back situation (**Appendix 1, Table 8**).
- 6.58 In the **Basis 3** fall-back situation, it is expected that there would be no perceivable change to the built form visible in the view as no increase in the height of the new building is anticipated. The replacement building being expected to be screened by the off-site vegetation. As the site will be operating, some vehicle movement and a greater increase in the lighting spread than the Basis 2 may be observed. The magnitude of visual effect for pedestrians and cyclists (and equestrians) is expected to be the same or very similar to Basis 2 in these locations, which is marked as **no/minimal to low beneficial** magnitude of visual effect. Thus, for a receptor of medium sensitivity the importance of visual effect for the Basis 3 fall-back situation would result in **no/minimal to slight beneficial effect** at Day 1 (**Appendix 1, Table 8**).

Visual Effects (Day 1) - Receptors north and north-east of the site- Residents - Viewpoint 4

- 6.59 From this point it is expected that the reduction in built form will be beneficial for the properties close to the Shell petrol station and the residents of the three or four properties near the top of the ramp, leading to Old Watling Street, north of the site who have an overlooking view, for the **MSS** scheme. The existing buildings would be removed, and part of the site returned to open landscape which would be beneficial. The vegetation surrounding the site screens much of the site but it is anticipated that parts of the shop roof and the fuel pump station canopy, vehicles and signs would be seen, and some additional lighting would be noted which would be adverse. As the shop roof is to have a sedum green roof, the building would be less prominent when seen in overlooking views from higher ground and there would be a reduction in built form. On balance the magnitude of the visual effect is considered to be medium with the beneficial and adverse effects essentially balancing out. Thus, the importance of visual effect is considered to be **no / minimal beneficial** effect at Day 1 for the MSS scheme (**Appendix 1, Table 8**).
- 6.60 In the **Basis 2** fall-back situation there would be no change to the built form within the site and therefore to the visibility of the existing buildings. The refurbished state of the buildings would not be very noticeable for these receptors. Most vehicular activity on the site would be screened and there would be no increase to the open landscape. Lighting would be noted although there is lighting already in view, but the footprint spread of lighting would be greater than on the MSS scheme. Therefore, it is considered that the magnitude of visual effect is considered to be no/minimal adverse due to the increased spread of lighting. Thus, the importance of visual effect would be **no/minimal adverse** for the Basis 2 fall-back situation at Day 1 (**Appendix 1, Table 8**).
- 6.61 In the **Basis 3** fall-back situation, the new and the existing building are expected be seen, however, the extent of built form is reduced compared to Basis 2. The benefit of the refurbished former Tollgate Inn would not be noticeable for these receptors. Most activity on the site would be screened by the buildings. Lighting would be noted as the footprint of lighting would be greater than on the Basis 2 and the MSS scheme. Thus, the minimal beneficial magnitude of visual effect due to build form reduction would balance out against the low adverse magnitude of visual effect due to the increase in the lighting spread. On balance, the resultant importance of visual effect would be **minimal adverse** at Day 1 for the Basis 3 fall-back situation (**Appendix 1, Table 8**).

Visual Effects (Day 1) - View from the top of the PRoW footpath NG23 – Viewpoint 7 (Photomontage D)

- 6.62 This is a pinpoint location, where the view of the site from the footpath NG23 is limited to only a short stretch at its higher part. For the **MSS** scheme, pedestrians on the footpath NG23, as they reach its highest point, will hardly see the new but lower forecourt building, set back from the site's edge and screened by the nearby vegetation along the NCR 177. Some vehicular movement may be noted. It is considered that the MSS would have a low

beneficial magnitude of visual effect, resulting in **slight beneficial** importance of visual effects at Day 1 (**Appendix 1, Table 8**).

- 6.63 In the **Basis 2** fall-back situation, the overall visibility of the roof and the massing of the former Tollgate Inn and the former motel will not change. The retained buildings will remain just visible above the tree line of the nearby vegetation. Benefits relating to the refurbishment of the retained buildings and the hotel operating are expected not to be appreciated from this location. Therefore, no change is expected in the magnitude of visual effect for the Basis 2 in this location. Thus, the importance of visual effect would result in **no effects** for this fall-back situation at Day 1 (**Appendix 1, Table 8**).
- 6.64 In the **Basis 3** fall-back situation, for pedestrians at the top of footpath NG23, it is anticipated that the reduction in built form and the new building will be hardly noticeable throughout the tree line of the nearby vegetation. The extended carpark will be screened by the buildings and the off-site vegetation. Thus, the magnitude of visual effect is considered to be no/minimal beneficial. The importance of visual effect is thus considered to be **no importance** for this fall-back situation at Day 1 (**Appendix 1, Table 8**).

Visual Effects (Day 1) - Other locations – Viewpoint 8

- 6.65 For Pedestrians, cyclists (and equestrians) on the eastbound approach from the vicinity of the Cyclopark building until reaching the vicinity of the green bridge over the A227/ Wrotham Road, the magnitude of visual effect would gradually rise from no / minimal to low beneficial for the **MSS** scheme. This results from the unused former motel building being removed and the new MSS scheme of a smaller footprint positioned at a lower level. Therefore the perception of built form would be considerably reduced or even not visible. Thus, the importance of visual effect for these receptors would range from **No/ minimal to slight beneficial effect** at Day 1 for the MSS scheme (**Appendix 1, Table 8**).
- 6.66 In the **Basis 2** fall-back situation, the magnitude of visual effect on the west bound approach from the vicinity of the Cyclopark building is considered to be no effect as no change would be noticeable from this location. For a receptor of medium sensitivity the resultant importance of visual effect is expected to be **no effect** at Day 1 for Basis 2 (**Appendix 1, Table 8**).
- 6.67 In the **Basis 3** fall-back situation, the magnitude of visual effect is considered to be no/minimal beneficial, as the reduction in built form would be just discernible and the extension of the car park would be screened from this location, thus the importance of visual effect for these receptors would be **no/minimal beneficial effect** at Day 1 for the Basis 3 fall-back situation (**Appendix 1, Table 8**).
- 6.68 Similar rankings are predicted for these receptors for the MSS scheme, and Basis 2 and Basis 3 fall-back positions when east of the eastern boundary of the site on the westbound approach including from the Wealdway footbridge over the A2 (Viewpoint 9 **and** Photomontage C).

- 6.69 To summarise the overall importance of the visual effects at Day 1, it is predicted that the MSS scheme would result in at least minimal to slight importance of visual effects that would be beneficial for the majority of the above viewpoints, with the greatest benefit predicted to be slight to moderate, at the site's road frontage (Viewpoint 1). This compares to the Basis 3 fall-back situation that is predicted, on average, to result in minimal beneficial importance of visual effects and the Basis 2 fall-back situation being predicted to have almost no importance of visual effects at Day 1.

Mitigation

- 6.70 Based on the above assessments, which have predicted that there would be no major adverse effects experienced at Day 1 for the MSS, no specific mitigation is proposed other than that embedded into the landscape strategy plan.

Residual Landscape Effects

- 6.71 It is expected that the planting integrated into the landscape strategy for the **MSS** scheme at Year 15 would have assimilated the redevelopment into the surrounding landscape with the landscape strategy positively contributing to the landscape character of this location. Therefore, the magnitude of the landscape effects would be predicted to be medium beneficial. (**Appendix 1, Table 4**). Thus, the importance of the landscape effect would be considered to be at least **slight beneficial** (**Appendix 1, Table 8**).
- 6.72 For the **Basis 2** fall-back situation, as there is no planting scheme developed, it has been assumed that there would be some planting carried out, similar to that found on site when the hotel was operating. This would be expected to deliver a very minor benefit within the site, as the scope of the planting is limited at the perimeter of the site, the magnitude of landscape effect would be expected to improve insignificantly to minimal beneficial (**Appendix 1, Table 4**). Thus, the importance of the landscape effect for the landscape of minimum/low sensitivity, would be considered to remain as **no effect** at year 15 for the Basis 2 fall-back situation (**Appendix 1, Table 8**).
- 6.73 For the **Basis 3** fall-back situation as there is no planting scheme developed, it can be assumed that there would be some potential for planting carried out around the car park, with minor benefits as a result. The magnitude of effect would be ranked as low beneficial due to the planting growth potentially screening the car park area (**Appendix 1, Table 4**). Thus, the importance of the landscape effect would be considered to be **minimal / slight beneficial** at year 15 for the Basis 3 fall-back situation (**Appendix 1, Table 8**).
- 6.74 In summary, the most beneficial predicted importance of landscapes effect at year 15 is expected to be delivered by the MSS scheme. The Basis 2 fall-back situation is expected to be the least beneficial in the long-term perspective.

Residual Visual Effects (Year 15)

Residual Visual Effects (Year 15) - At the site's road frontage - Vehicle Travellers – Viewpoint 1 (Photomontage A)

- 6.75 At Year 15, it is expected that the landscape planting integrated into the **MSS scheme**, would be well established, assimilating the redeveloped site into surrounding landscape. The visual receptors at the site frontage that are predominantly vehicle travellers on the roundabout, would have filtered views through the maturing trees on the western side of the **MSS** scheme onto the forecourt building and its green roof, and the canopies, set against a green backdrop of the established vegetation on the reprofiled banks in the eastern part of the site. It is expected that the filtering effect would further reduce the visibility of the new buildings, with the sign positioned in the western part of the site being visible to direct vehicle travellers. The overall appearance of the approach to Gravesend at the roundabout in front of the site is expected to be 'greener' and well maintained, and more welcoming. The magnitude of visual effect for the MSS scheme is expected to be medium beneficial at year 15 (**Appendix 1, Table 6**). In a view of low receptor sensitivity for vehicle users the importance of visual effects is expected to be **slight beneficial** (**Appendix 1, Table 8**) at Year 15 for the MSS scheme.
- 6.76 For the **Basis 2** fall-back situation, there is no planting scheme developed, but it can be assumed that there would be some planting carried out as it was previously when the hotel was operating, with very minor benefits as a result at year 15. Therefore, the magnitude of effect would remain ranked as minimal beneficial due to the limited space at the site's perimeter for screening planting and the minimal anticipated impact on the overall screening of the buildings. In a view of low receptor sensitivity for vehicle users, the importance of visual effects is expected to be **no effect** (**Appendix 1, Table 8**) at Year 15 for the Basis 2 fall-back situation.
- 6.77 For **Basis 3** fall-back situation, there is no planting scheme developed, it can be assumed that there would be some planting carried out with minor benefits as a result at Year 15. For vehicle travellers the magnitude of visual effect is expected to be low beneficial as the anticipated planting around the car park would soften the car park appearance, but the former Tollgate Inn with its alignment to the old layout of A2 and its massing would remain prominent (**Appendix 1, Table 6**). In a view of low receptor sensitivity for vehicle users the importance of visual effects is expected to be **minimal / slight beneficial** (**Appendix 1, Table 8**) at Year 15 for the Basis 3 fall-back situation.

Residual Visual Effects (Year 15) - At the site's road frontage – Pedestrians / Cyclists – Viewpoint 1(Photomontage A)

- 6.78 For pedestrians / cyclists at the site frontage roundabout, because of their medium sensitivity, the magnitude of change anticipated to be medium beneficial, the resultant ranking of the importance of visual effect is expected to be **moderate beneficial** at Year 15 for the **MSS** scheme.
- 6.79 For pedestrians / cyclists for the **Basis 2** fall-back situation at the site frontage roundabout the magnitude of effect is expected to be minimal beneficial due to the limited space at the site's perimeter, resulting in the minimal anticipated impact on the overall screening of the buildings. In view of the medium receptor sensitivity for pedestrians /cyclists the

importance of visual effects is expected to be **minimal beneficial** (Appendix 1, Table 8) at Year 15.

- 6.80 For pedestrian / cyclists at Year 15 for the **Basis 3** fall-back situation, the magnitude of change is anticipated to be low beneficial, in view of medium sensitivity of the receptors, the resultant ranking of the importance of visual effect would result in **slight beneficial** effects at Year 15.

Residual Visual Effects (Year 15) - Vehicle travellers on the A2 and the A2 slip roads etc Viewpoint 2 and 3

- 6.81 For vehicle travellers on the A2 and the A2 slip roads accessing the roundabout with Wrotham Road (Viewpoint 2), and for users of the Wrotham Road from where the site would have been seen (Viewpoint 3), other than from the frontage, it is expected that the maturing vegetation would largely screen the redeveloped site, resulting in low to medium beneficial magnitude of visual effect for the **MSS** scheme. Thus, the resultant importance of visual effect is expected to be **minimal/slight to slight beneficial** at Year 15 for the **MSS** scheme (Appendix 1, Table 8).
- 6.82 At Year 15 the **Basis 2** fall-back situation, for vehicle travellers the magnitude of effect is expected to remain ranked as no/minimal beneficial due to the limited space at the site's perimeter for planting and screening, and therefore minimal anticipated impact on the overall screening of the buildings. In a view of low receptor sensitivity for vehicle users the importance of visual effects is expected to be **no effect** (Appendix 1, Table 8) at Year 15.
- 6.83 At Year 15 the **Basis 3** fall-back situation, for vehicle travellers, it is expected that despite the maturing planting softening the appearance of the car park, the car park would remain apparent from Viewpoint 2, resulting in minimal to low beneficial magnitude of visual effects. Thus, the resultant importance of visual effects for the receptors of low sensitivity is expected to be **no effect to minimal / slight beneficial** at Year 15 (Appendix 1, Table 8).

Residual Visual Effects (Year 15) - Receptors north of the site – Pedestrians, cyclists (and equestrians) - Viewpoint 4, 5 (Photomontage B) and 6

- 6.84 Pedestrians on the ramp leading to Old Watling Street (Viewpoint 4), pedestrians, cyclists (and equestrians) on the Wealdway / NCR 177 (Viewpoint 5) as well as pedestrians on the old alignment of Wrotham Road (Viewpoint 6), as they pass to the north and north-east of the site, it is predicted that the integrated planting would be well established and merged with the vegetation surrounding the site. The **MSS** scheme would be well embedded in its green landscape setting. Thus, in the vicinity to the site, visibility of the site is expected to be reduced further. The receptors, ranked as having medium sensitivity, are expected to experience medium magnitude of visual beneficial effects. (Appendix 1, Table 6). Therefore, the resultant importance of visual effects is expected to be **moderate beneficial** at Year 15 for the **MSS** scheme (Appendix 1, Table 8).
- 6.85 At Year 15 the **Basis 2** fall-back situation, as no to very minor softening of the views is

expected due to the growth of the surrounding vegetation and the planting within the site, the magnitude of visual effects for pedestrians and cyclists (and equestrians) is expected to remain the same as in Day 1, ranging from no/minimal to low beneficial effects, resulting for a receptor of medium sensitivity in **no/minimal to slight beneficial** importance of visual effects at Year 15 (**Appendix 1, Table 8**).

- 6.86 At Year 15 the **Basis 3** fall-back situation, for pedestrians, cyclists (and equestrians), the very minor softening of the views, similar to Basis 2, is expected due to the growth of the off-site vegetation and the planting within the site. The magnitude of visual effects is predicted to remain the same as in Day 1, and also being similar to the Basis 2 fall-back situation in this location, ranging from no/minimal to low beneficial,. Therefore, importance of visual effect is expected to remain **no/minimal to slight beneficial** for Basis 3 fall-back situation.

Residual Visual Effects (Year 15) - Receptors north and north-east of the site- Residents - Viewpoint 4

- 6.87 At Year 15 for residents of the properties close to the Shell petrol station and the three or four properties near the top of the ramp leading to Old Watling Street north of the site, who have an overlooking view of the **MSS** scheme, it is expected that the maturing vegetation would largely reduce views onto the site. The planting on the land returned to open landscape, is expected to be well established and assimilating the MSS scheme into the vegetation surrounding the site. that would further increase the screening of the site. Additionally, the forecourt's sedum roof will continue to help soften the building when viewed from higher ground. On balance the magnitude of the visual effect is expected to be medium and beneficial (**Appendix 1, Table 6**). Thus, the importance of visual effect is expected to be **moderate and beneficial** at Year 15 for the MSS scheme (**Appendix 1, Table 8**).
- 6.88 At Year 15 the **Basis 2** fall-back situation, for the residents of the three or four properties near the top of the ramp leading to Old Watling Street north of the site, who have an overlooking view of the site, the magnitude of visual effect is expected to raise from no/minimal to low beneficial only due to the surrounding vegetation growth but no other changes are anticipated, resulting for a receptor of medium sensitivity in **no/minimal to slight beneficial** importance of effect of at Year 15. (**Appendix 1, Table 8**).
- 6.89 At Year 15 the **Basis 3** fall-back situation for residents of the three or four properties near the top of the ramp leading to Old Watling Street north of the site, who have an overlooking view of the site, the low adverse magnitude of visual effects predicted at Day 1 due to the increased lighting spread is expected to be slightly reduced due to the planting growth resulting in minimal beneficial magnitude of visual effects, but no other changes are predicted. Therefore, importance of visual effect, for the receptors of medium sensitivity, is expected to be **minimal beneficial**, at Year 15 for the Basis 3 fall-back situation (**Appendix 1, Table 8**).

Residual Visual Effects (Year 15) - View from the top of the PRow footpath NG23 – Viewpoint 7 (Photomontage D)

- 6.90 At Year 15 for the **MSS scheme** for pedestrians at the top of the footpath NG23, further growth of the planting integrated to the redevelopment and the vegetation surrounding the site is predicted, resulting in further screening of the MSS scheme, making it almost indiscernible. The magnitude of visual effects is expected to be medium beneficial. Therefore, the importance of visual effect is considered to be **moderate beneficial** at Year 15 (**Appendix 1, Table 8**).
- 6.91 At Year 15 for the **Basis 2** fall-back situation for pedestrians at the top of the footpath NG23, a minimal beneficial magnitude of visual effects is expected largely due to the growth of the off-site vegetation. Therefore, the importance of visual effect is predicted to be **minimal beneficial** at Year 15 (**Appendix 1, Table 8**).
- 6.92 At Year 15 the **Basis 3** fall-back situation for pedestrians at the top of the footpath NG23, the magnitude of visual effects is predicted as minimal to low beneficial, due to the growth of the planting within the site and the off-site vegetation, no other changes are anticipated. Therefore, the importance of visual effect is expected to be **minimal to slight beneficial** at Year 15. (**Appendix 1, Table 8**).

Residual Visual Effects (Year 15) – Y15 - Other locations – Viewpoint 8

- 6.93 For Pedestrians, cyclists (and equestrians) on the eastbound approach from the vicinity of the Cyclopark building until reaching the vicinity of the green bridge over the A227/ Wrotham Road, as the MSS scheme is set on a lowered ground level, the increase in the growth of the planting and the off-site vegetation is predicted to have a greater screening effect on the MSS scheme than on the Basis 2 and Basis 3. Therefore, the magnitude of visual effects would gradually rise from low to medium beneficial effect for the **MSS** scheme. Thus, for the receptors of medium sensitivity, the importance of visual effects would range from **slight to moderate beneficial** at Year 15 (**Appendix 1, Table 8**).
- 6.94 At Year 15 the **Basis 2** fall-back situation for pedestrians, cyclists (and equestrians) on the eastbound approach from the vicinity of the Cyclopark building until reaching the vicinity of the green bridge over the A227/ Wrotham Road, the magnitude of visual effects is expected to be minimal beneficial due to the off-site vegetation growth. Therefore, for these receptors of medium sensitivity, the importance of visual effect would be **minimal beneficial**.
- 6.95 At Year 15 the **Basis 3** fall-back situation for pedestrians, cyclists (and equestrians) on the eastbound approach from the vicinity of the Cyclopark building until reaching the vicinity of the green bridge over the A227/ Wrotham Road, the magnitude of visual effects is expected to be minimal beneficial. Therefore for these receptors of medium sensitivity, the importance of visual effects would be **minimal beneficial** at Year 15.
- 6.96 At Year 15 similar rankings are predicted for these receptors for the MSS scheme, the Basis 2 and the Basis 3 fall-back positions, when east of the eastern boundary of the site

on the westbound approach including from the Wealdway footbridge over the A2 (Viewpoint 9 and Photomontage C).

- 6.97 In summary at Year 15, it is expected that the MSS scheme has 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. The Basis 2 and the Basis 3 fall-back situations do not have the potential to deliver the same level of visual benefit at Year 15.

7 GREEN BELT

- 7.1 Because of the site's location within the Metropolitan Green Belt, HBA have been asked to consider the effect of the proposed redevelopment on the Green Belt, in particular its openness. As Green Belt is not a landscape designation, the considerations of the impact of the proposed redevelopment on the Green Belt qualities, stated in the NPPF, are considered separately in this chapter.
- 7.2 HBA will also look at the findings of the 'Stage 2' assessment of the Green Belt for Gravesham Borough Council undertaken by LUC and published as Gravesham Stage 2 Green Belt Study August 2020 in the context of the site.

The impact of the proposals on Green Belt qualities in the context of the NPPF

- 7.3 The fundamental aim of the Green Belt, as stated in paragraph 142 of the NPPF, is "to prevent urban sprawl by keeping land permanently open". The purpose of this assessment is to investigate the effect of the proposed redevelopment on the 'openness' and in this context how the fall-back positions impacts the Green Belt's fundamental aim.
- 7.4 Paragraph 143 of the NPPF records the five purposes that Green Belt serves:
- 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.
- 7.5 In this case, purposes a), c) and e) are relevant to the consideration of the effect of the redevelopment proposal on the Green Belt.
- 7.6 Paragraph 150 of the NPPF states that the proposed redevelopment is to assist the local planning authority with the "enhancement of landscapes, visual amenity and biodiversity; or to improve damaged and derelict land."
- 7.7 Paragraph 154 of the NPPF states that local planning authority should regard the construction of new buildings as inappropriate in the Green Belt. Exceptions to this are:
- 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;

7.8 Paragraph 155 of the NPPF notes that:

“Certain 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:

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

7.9 As noted at the start of Section 5, the following consideration is based on the total removal of all the existing buildings on the site and the formation of the MSS scheme within the central part of the site, all as indicated on the application drawings.

7.10 The hard and soft areas and the buildings’ footprints and bulk-built volume of the MSS scheme are compiled in **LVA Report Table 1** below. The figures exclude the off-site road widening.

TOTAL AREA WITHIN THE RED LINE	12,197m ²	12,196m ²
ELEMENT	SITE AS EXISTING Area or volume	MSS SCHEME Area or volume
Buildings volume	10,234 m ³	2,627 m ³
Buildings Footprint	1,926 m ²	481 m ²
Canopies	N/A	743m ²
Hardstanding (including under canopies)	6,688 m ²	6,582 m ²
Landscaping	3,583 m ²	5,133 m ²

LVA Report Table 1 – comparison of built areas and hard and soft landscape

7.11 A comparison in the above table shows that the proposed above ground volume of the MSS scheme would equate to only about 25% of the current total site bulk volume. The MSS scheme represents a significant reduction in bulk volume.

7.12 Similarly, the footprint of built form would also be significantly reduced from a total of just under 2000m² for the whole site to a proposed footprint of 481m² for the MSS scheme, a reduction in 75% of footprint.

7.13 In terms of site coverage by hardstanding, the MSS scheme shows a modest reduction in the order of 102m², this equating to a 1.6% reduction in hardstanding when compared to the existing situation.

7.14 One consequence of the above reductions would be that the proportion of the site dedicated to landscaping (open space) in the MSS scheme would increase by nearly 1,550m².

- 7.15 Looked at in the round, it is considered that there would be clear and very positive benefits arising from the decrease in built form as well as the increase of the area dedicated to landscaping in the proposed MSS scheme over the site in its present form. Thus, on this simple basis, it is concluded that the openness of the Green Belt would not be harmed by the MSS scheme, in fact it would be notably enhanced at the local level.
- 7.16 As paragraph 142 of the NPPF makes clear, the fundamental aim of Green Belt policy is to prevent urban sprawl by keeping land permanently open. In terms of the purposes of Green Belt, in a modest way, urban sprawl would be reduced (Purpose a), encroachment into the countryside would be reduced (Purpose c) and urban regeneration would be assisted by bringing a disused site back into beneficial use (Purpose e).
- 7.17 However, case law has confirmed that the effect on the Green Belt is not simply one of volumes and footprint but should also involve an appreciation of how the proposal sits in the landscape and is perceived in its local context as compared to the site in its existing condition. The concept of openness of the Green Belt thus has a visual dimension. The perception of the proposal is a part of the consideration of openness.
- 7.18 In this case both the landscape and visual assessment set out in Section 6 found that the effects of the MSS scheme would be beneficial, albeit the landscape benefit would be smaller as compared to the visual benefits.
- 7.19 In the case of the MSS scheme, the perceptual benefits identified in the visual assessment are very largely to do with the removal of the existing built form (as opposed to hard surfacing), 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 MSS scheme, the site would appear much more open and less prominent.
- 7.20 In addition to the built form, it is necessary to also take account of the use of the site as the MSS. This would see the reintroduction of vehicles, lighting, signs, movement, noise and so forth, but all these aspects are also intrinsic to the fall-back situations in which these features would occur on a site wide basis. Thus, the MSS proposal, whilst representing a change from how the site is currently perceived, is directly and favourably comparable to the fall-back situations. Openness is essentially freedom from operational development and relates primarily to the quantum and extent of development and its physical effect on the site.
- 7.21 In line with Paragraph 154 of the NPPF the proposed MSS scheme can be classified as *'developments that are not inappropriate'*:
- 7.22 The MSS scheme is in line with Paragraph 154, 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'*.

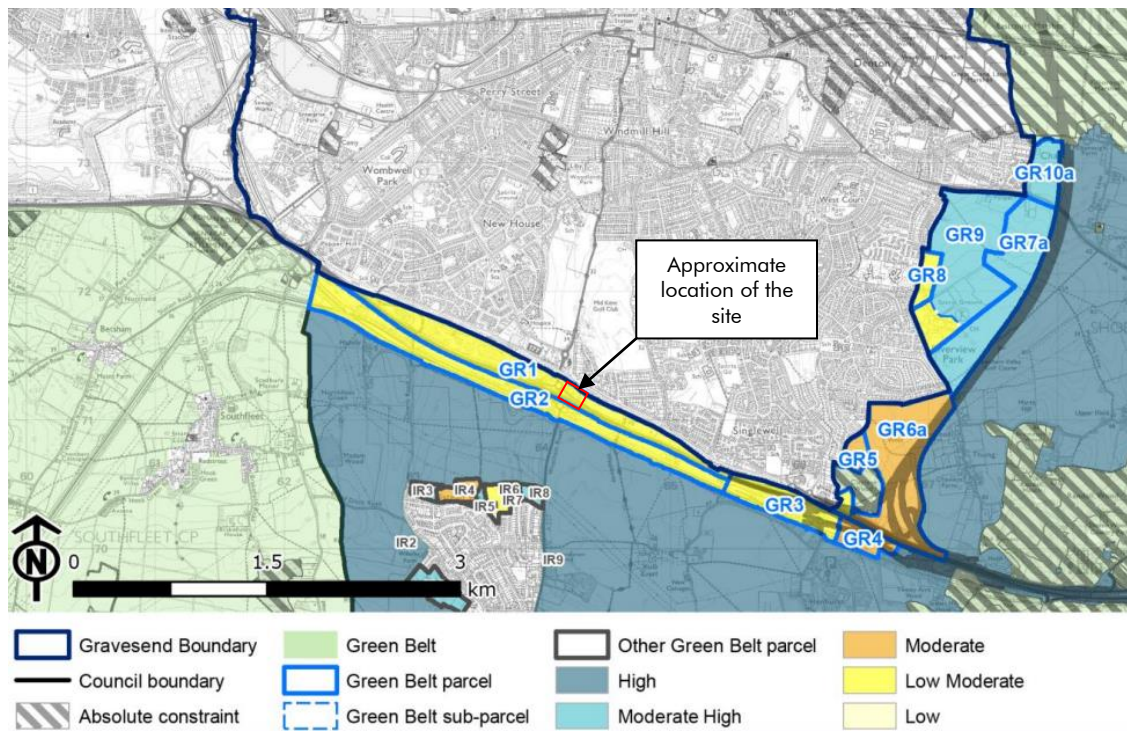
- 7.23 Additionally, The MSS scheme would be in line with Paragraph 155c of the NPPF, as it would be part of *'the local transport infrastructure'*,
- 7.24 The MSS scheme, by reducing the extent of operational development, would return the balance of the site to open land, contributing positively to improving the *'openness'* of the Green Belt, with the whole MSS scheme being subject to appropriate long term management.
- 7.25 It is considered that the effect on the openness of the Green Belt would be locally beneficial as a result of the removal of the prominent disused motel building, the removal of the mass of the Mock Tudor style former frontage building and the removal of the other site paraphernalia, all only partly offset by the introduction of a smaller building with forecourt canopies substantially lower than the existing built form and the operational development being contained to a smaller part of the site. This would be in accordance with the fifth purposes of the Green Belt: *"to assist in urban regeneration, by encouraging the recycling of derelict and other urban land"*.
- 7.26 The assessment in Section 6 shows that there would be landscape and visual amenity enhancement arising from the redevelopment and thus the guidance in NPPF Paragraph 150 *"that local planning authorities should plan positively to enhance their beneficial use, such as.....to enhance landscapes, visual amenity...."* would be delivered by the grant of planning permission.
- 7.27 It is concluded that the MSS scheme would be in line with the NPPF, and there would be clear benefits to the openness of the Green Belt and its perception arising from the implementation of the MSS scheme. The MSS schemes footprint, volume, hard surfacing, and the extent of the operational development would be reduced (NPPF, paragraph 143). The area of soft landscape would increase (NPPF, paragraphs 142). The perception of the site would improve to one of more open and *'greener'*, enhancing the appearance of the approach to Gravesend via the Tollgate roundabout from the A2 and Wrotham Road (NPPF, paragraph 150).

Gravesham Stage 2 Green Belt Study August 2020

- 7.28 In 2018 there was a *'Stage 1'* study that was published in April. The Stage 1 study was a high-level appraisal, of all land within the Green Belt in Gravesham, in terms of its contribution to the five purposes of the Green Belt. It was prepared to inform consultation on the options for accommodating future growth in the Borough and to inform the subsequent more focused and finer grained assessment *'Gravesham Stage 2 Green Belt Study'* undertaken by LUC and published in August 2020.
- 7.29 The overall purpose of the Stage 2 study was to undertake independent, more specific spatial assessment of extent of the harm to the purposes of the Green Belt (as set out in NPPF). It focussed on land around the urban area and rural settlements inset from the Green Belt, in the context of releasing land from the Green Belt in Gravesham for development.

“The purpose of the study is not to set out what exceptional circumstances may exist for changing the Green Belt boundaries. Nor is its purpose to identify where or how much land should be released from the Green Belt. As such, the study does not suggest that the parcel boundaries identified, which reflect variations in harm, should necessarily form revised Green Belt boundaries.”

- 7.30 However, the findings of the Stage 2 assessment could inform the proposals for the redevelopment of the site, where possible and applicable improving site’s contribution into the openness, the essential quality of Green Belt.
- 7.31 The site is one of the 122 parcels assessed in the Stage 2 report. The findings of the study reflected on the potential harm to Green Belt purposes, rated on the basis of a 5-point scale of high, moderate-high, moderate, low-moderate and low.
- 7.32 The site is positioned within parcel GR1 of the Stage 2 assessment, occupying a small proportion of the GR1 parcel (Figure 4), and is directly neighbouring with parcels GR2.



LVA Report Figure 4 – Extract from Gravesham Stage 2 Green Belt Study, Appendix A Final, LUC August 2020 included in HBA Appendix 5

- 7.33 The contribution of Parcel GR1 as well as GR2 GR3 to the Green Belt purposes has been assessed as follows:

Purpose 1 - Check the unrestricted sprawl of large built-up areas – MODERATE contribution.

Purpose 2 – Prevent neighbouring towns merging into one another- LIMITED / NO contribution.

Purpose 3 – Assist in safeguarding the countryside from encroachment - RELATIVELY LIMITED contribution.

Purpose 4 – Preserve the setting and special character of historic towns - LIMITED / NO contribution.

Purpose 5 - Assist in urban regeneration, by encouraging the recycling of derelict and other urban land - EQUAL contribution.

7.34 The results/findings of the Stage 2 assessment for the Parcel GR1 reiterate the NPPF paragraph 138, and the identified Purpose 1,3 and 5, are relevant to the MSS scheme and its impact on the Green Belt.

7.35 As noted above, the MSS scheme would positively contribute to the openness of the Green Belt by:

- Reducing the footprint of buildings
- Reducing the area of hard surfacing
- Increase area of soft landscape
- Enhancing the structure of the soft landscape as appropriate to the site's ecological context
- Providing continuity to the existing landscape elements contributing into the openness of Green Belt
- Bringing back to use the derelict site, while incorporating all the above.

8 CONCLUSION

- 8.1 This Landscape and Visual Appraisal has set out the landscape and visual context of the site for the removal of a redundant / disused petrol filling station and motel at the Tollgate roundabout at the junction of the newly improved and realigned A2 with Wrotham Road, in the open countryside and the Green Belt, at the southern fringe of the urban edge of Gravesend. A new motorist service station would be built on the western part of the site.
- 8.2 The site has been disused for many years and was used as a contractor's compound during the A2 roadworks.
- 8.3 Reference has been made to earlier Landscape and Visual Overview reports prepared by HBA in 2012 and 2018 and other relevant documents have also been noted.
- 8.4 The landscape character of the area in which the site lies has been reviewed by reference to national, county and borough landscape character studies. It is noted that the Gravesham Landscape Character Assessment guidelines for the Gravesend Southern Fringe Landscape Character Area in which the site lies are to Restore and Create.
- 8.5 The LVA sets out the landscape policy and baseline context of the site and identifies the landscape and visual attributes and sensitivities relevant to the proposal.
- 8.6 The baseline assessment concludes that the landscape condition of the site as it now exists is considered to be very poor and its landscape value is poor.
- 8.7 The redevelopment proposal as the MSS scheme has been described including the clearance of the whole of the former site. In addition, Basis 2 and Basis 3 fall-back positions have been outlined.
- 8.8 The landscape and visual assessment shows, that the MSS proposal would result in a modest landscape benefit whilst the visual assessment has found a somewhat greater level of benefit would arise in visual amenity terms for visual receptors from the MSS scheme as compared to the Basis 2 and Basis 3 fall-back situations.
- 8.9 Landscape proposals have been integrated into the design of the MSS scheme along with the engineering proposals. It is expected that the proposed landscape strategy would introduce new planting and landforms that would visually enhance the MSS scheme facilitating its good integration into the surrounding landscape and with the green corridor in which the site sits. The range of landscape measures would further assist in achieving some of the Restore and Create objectives identified in the Gravesend Landscape Character Assessment. The MSS scheme would also improve the overall appearance of the approach to Gravesend from Wrotham Road and A2, creating a new landscape identity for the redeveloped site with regard to its local 'gateway' location.
- 8.10 Further enhancement opportunity to the approach to Gravesend could be provided if the dying or missing trees at the Tollgate roundabout, in front of the site, were replaced. As the roundabout is outside of the site boundary, special arrangements would have to be made to facilitate this further enhancement.

- 8.11 The assessment has considered the effect of the MSS proposal on the Green Belt, in particular on its openness and in the light that the perception of the MSS scheme and the extent of operational development all form part of the consideration of openness. It is concluded that there would be clear and very positive benefits to the openness of the Green Belt and its perception arising from the implementation of the MSS scheme on account of a decrease in built form as well as an increase in areas of landscaping on the site. On this basis, the openness of the Green Belt would not be harmed by the MSS scheme but would be notably enhanced at a local level.