



Gravesham Borough Council

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Highways and Transportation

Kroner House
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Tel: 03000 418181

Date: 21 November 2024

Our Ref:

Application - GB/20240856

Location - Former Tollgate Hotel, Watling Street, Gravesend, Ken

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

Thank you for your consultation in relation to the above planning application. I have the following comments to make with respect to highway matters :-

This proposal was the subject of highways pre-application advice from both Kent Highways and National Highways in December 2022 when both authorities agreed on the content of a supporting Transport Assessment.

The current application is supported by a Transport Assessment dated 16th September 2024 followed by a Transport Assessment Addendum dated 24th October 2024 which provided traffic modelling information not included in the original Transport Assessment.

I have now had the opportunity to consider both of these documents and would make the following comments:

Sustainable travel

There are no Sunday bus services and very limited services during the week (308 has 7 services per day and the 416 has 5 journeys per day). However, it would only be staff travelling by sustainable modes and there are walking and cycling links around the site, including to the residential area to the north, so this is a realistic option. However the pedestrian link between the southbound bus stop on Wrotham Road north of the underpass is poor and proposals to improve that link for staff should be submitted.

Vehicle Access and Visibility

Access to the site is proposed to remain as existing, with some widening within the site itself. The principal of this is acceptable. However, given the intensification of use under the

proposals, a plan showing appropriate visibility splays at the site access and pedestrian crossing points should be provided to demonstrate these are achievable. Any vegetation within the splays must be maintained at a maximum height of 0.6m.

Vehicle tracking drawings 22052-MA-XX-XX-DR-C-7000 P02 (large car), 22052-MA-XX-XX-DR-C-7005 P02 (oil tanker), 22052-MA-XX-XX-DR-C-7010 P02 (large refuse), 22052-MA-XX-XX-DR-C-7015 P02 (10m Rigid) and EV005-PS-LAY-000-GB00015044-0009-001 B01 / 14170-28 Rev D (oil tanker and HGV) show all noted vehicles are able to access and egress the site in a forward gear. The drawings do not show the vehicle existing the site on to the A2 eastbound slip, and should be updated to demonstrate this. However, it is unlikely that this manoeuvre would be an issue.

In my previous pre-app comments I commented that under the previous application for the PFS – GR/20161215 - included a new dedicated left slip lane on the roundabout at the access to the site. This is not mentioned in the current proposal details. I would expect the traffic generation for the PFS / EV Charging Station / retail to be at least equal, if not greater, than this previous application. It also provided an improved and safer route for pedestrians circulating the roundabout. Has this requirement been considered? I would appreciate a response from the developer on this matter.

Parking

A total of 63 vehicle parking spaces are proposed on site, consisting of 22 standard EV charging spaces, two disabled EV charging spaces, 33 standard spaces, four standard disabled spaces, and four staff spaces. A minimum of one space should be provided for adapted bikes, which requires 1.5m between stands to allow for dismounting. Whilst there may be a shortage of staff parking spaces for the number of staff predicted, it is accepted that space is available on site for any overflow and would not impact on the public highway.

This provision is considered to be acceptable.

Crash Data

The crash data is for 7 years, but doesn't provide much analysis. It just says there were 34 incidents, 29 slight, 5 serious, and their locations. It doesn't show what year they took place etc. For the middle roundabout (site access) the crashes are all on EB slip road or Wrotham Road. I consider that the crash record will not be compromised by this proposal.

Trip Generation and Distribution

The trip generation and distribution assessment is considered to be acceptable

Traffic Surveys

As you are no doubt aware, Galley Hill Road in Northfleet has been closed since 10th April 2023. The traffic surveys used to inform the the modelling was undertaken on 2nd March 2023 - prior to the closure. This may make the traffic numbers an underestimate since the distribution on the network is likely to have changed as a result of the closure. I would suggest a brief ATC survey is undertaken at Tollgate to assess whether the survey data previously obtained is still similar.

Highway Impact

This is covered in the Transport Assessment Addendum dated October 2024

Junctions assessed:

- A227 Wrotham Road / Coldharbour Road / Wrotham Road roundabout;
- A227 Wrotham Road / A2 eastbound slip road roundabout; and

- A227 Wrotham Road / A2 westbound slip road roundabout.

They have assessed the following years:

- 2023 Baseline;
- 2025 Opening Year (in accordance with 01/2022 Circular and pre-application discussions with NH); and
- 2028 Future Year (+5 year horizon)

They have updated TEMPro from v7.2c to v8.1. The latter has higher growth rates so it is acceptable.

The list of committed developments is very extensive although I have doubts whether many of these developments, given their distance from the proposed site, will have more than a minimal impact. The assessment is acceptable.

Modelling

I am aware that there are some on going queries in the modelling with NH in their consultation response dated 12th November 2024 , so will await the outcome of those queries before commenting further on the resulting assessment which indicates that mitigating measures on the roundabout to the south of the A2 (A2 westbound off-slip / Wrotham Road).

As you are aware, I must raise concerns regarding the proposed traffic signal works on the southern roundabout which were required as a Condition (34) of the Coldharbour Road residential development (GR/20141214) and which have still not been undertaken even though the trigger for implementation has been passed. Any implementation of this scheme (requested by NH) would affect considerably affect the modelling results and I would suggest that both scenarios are modelled - with the traffic signals and with the removal of the left-turn only markings.

Conclusions

In view of the concerns indicated above, particularly in relation to the traffic surveys and modelling, and the additional information requested by National Highways, I would request that a holding objection be placed on this application until such time that these issues have been satisfactorily resolved.

Conditions

Should it be decided to give consent to the current proposal I would recommend the following Conditions to be applied to that consent:

- 63 vehicle parking spaces to be provided on site from first occupation and permanently maintained. Provision to include 22 standard EV charging spaces, two disabled EV charging spaces, 33 standard spaces, four standard disabled spaces, and four staff spaces.
- The 24 electric vehicle charging spaces are to be provided with ultra-rapid electric vehicle charging infrastructure.
- Six covered cycle parking spaces are proposed to be provided. A minimum of one space should be provided for adapted bikes, which requires 1.5m between stands to allow for dismounting.
- As per drawing EV005-PS-LAY-000-GB00015044-0005-002 B01 / 14170-22-1 Rev G, a 3m shared pedestrian cycle route to be provided through the site between the existing routes at the A2 Eastbound onslip and the pedestrian/cycle route to the north of the site (NCR 177), upon first occupation and permanently maintained.

- Construction Management Plan to be submitted and approved prior to any works, including demolition, is commenced.
- Details of visibility splays at the access to be submitted and approved before any works, including demolition, commenced. Any vegetation within the splays must be maintained at a maximum height of 0.6m.

It is important to note that Local Planning Authority (LPA) permission does not convey any approval to carry out works on or affecting the public highway.

Any changes to or affecting the public highway in Kent require the formal agreement of the Highway Authority, Kent County Council (KCC), and it should not be assumed that this will be given because LPA planning permission has been granted.

For this reason, anyone considering works which may affect the public highway, including any highway-owned street furniture or landscape assets such as grass, shrubs and trees, is advised to engage with KCC Highways and Transportation at an early stage in the design process.

Across the county there are pieces of land next to private homes and gardens and near the highway that do not look like roads or pavements but are actually part of the public highway.

Some of this highway land is owned by Kent County Council whilst some is owned by third party owners. Irrespective of the ownership, this land may have 'highway rights' over the topsoil.

Works on private land may also affect the public highway. These include works to cellars, to retaining walls which support the highway or land above the highway, and to balconies, signs or other structures which project over the highway. Such works also require the approval of the Highway Authority.

Kent County Council has now introduced a pre-application advice service in addition to a full formal technical approval process for new or altered highway assets, with the aim of improving future maintainability. Further details are available on our website below:

<https://www.kent.gov.uk/roads-and-travel/highway-permits-and-licences/highways-permissions-and-technical-guidance>.

This process applies to all development works affecting the public highway other than applications for vehicle crossings, which are covered by a separate approval process. Further details on this are available on our website below:

<https://www.kent.gov.uk/roads-and-travel/highway-permits-and-licences/apply-for-a-dropped-kerb/dropped-kerb-contractor-information>

Once planning approval for any development has been granted by the LPA, it is the responsibility of the applicant to ensure that before development commences, all necessary highway approvals and consents have been obtained, and that the limits of the highway boundary have been clearly established, since failure to do so may result in enforcement action being taken by the Highway Authority.

The applicant must also ensure that the details shown on the approved plans agree in every aspect with those approved under the relevant legislation and common law. It is therefore important for the applicant to contact KCC Highways and Transportation to progress this aspect of the works prior to commencement on site.

Further guidance for applicants, including information about how to clarify the highway boundary and links to application forms for vehicular crossings and other highway matters, may be found on Kent County Council's website:

<https://www.kent.gov.uk/roads-and-travel/highway-permits-and-licences/highways-permissions-and-technical-guidance>. Alternatively, KCC Highways and Transportation may be contacted by telephone: 03000 418181.

Yours faithfully

Director of Highways & Transportation

*This is a statutory technical response on behalf of KCC as Highway Authority. If you wish to make representations in relation to highways matters associated with the planning application under consideration, please make these directly to the Planning Authority.