
Hi Kathryn,

I have written out our response to the comments below. Regarding updating the AQA, as the changes to the traffic data only impact the slip road and because this slip road is over 200m from any sensitive receptor, we do not find it necessary to update the AQA. I have included this justification within the text below:

An air quality assessment (GM12206-001) has been undertaken to accompany a planning application for a proposed electric vehicle (EV) charging facility at the former Tollgate Hotel site off Wrotham Road and Watling Street, Gravesend. It is proposed to demolish the former Tollgate Hotel/restaurant buildings and construct a petrol filling station/EV charging hub with associated sales building and parking. The assessment considered dust and fine particulate matter during the construction phase, and road traffic emissions during the operational phase. The air quality assessment concluded that the development would result in concentrations of NO², PM¹⁰ and PM^{2.5} remaining below the air quality objectives/target values, both without and with the development for the proposed 2025 opening year and 2028 future year. Therefore, the assessment demonstrated that the Proposed Development will not lead to an unacceptable risk from air pollution, or to any breach in national objectives. Following submission, comments were received from Environmental Protection. The text below provides a response to those comments.

A damage cost assessment has been requested by Gravesham Borough Council (GBC), which provides a basis for quantifying a financial commitment required to offset potential development generated traffic emissions. An air pollution damage cost assessment utilises the current DEFRA Emission Factor Toolkit to estimate the annual link emissions associated with the additional development generated vehicle trips over a 5-year period.

Since the air quality assessment was undertaken, the Traffic Assessment has been revised and a Transport Assessment Addendum dated 24 October 2024 has been submitted. The objection from the Highways Agency noted that this may influence the findings of the Transport Assessment. The appointed transport consultant, Markides Associates, have confirmed that the traffic flows were updated to account for committed developments in the local area. However, apart from the A2 slip road, accessed via Wrotham Road, all traffic flows remain unchanged. As this slip road is located more than 200 metres from any sensitive receptor, it is unlikely to result in elevated levels of air pollution at those locations. Therefore, it is not considered necessary to update the flows within the AQA.

The appointed transport consultant, Markides Associates, still retain that all visitors to the proposed development will be vehicles already on the highway, and therefore the development will not generate any new trips. Additionally, the proposed development will include an EV charging facility, meaning the development itself is mitigating against poor air quality by promoting sustainable transport options in the provision of new EV charging facilities. Given these factors, it is not considered appropriate to calculate a damage cost, and therefore one has not been included.

Please let me know if you have any comments/queries and I will be more than happy to address them.

Kind regards,

Arlishia

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