



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

From: Michelle Berrington (Head of Planning & Development)
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To: Gravesham Borough Council (FAO Alison Webster)
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CC: transportplanning@dft.gov.uk
spatialplanning@nationalhighways.co.uk

Council's Reference: 20240856

Location: Former Tollgate Hotel, Watling Street, Gravesend, Kent

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

National Highways Ref: NH/24/08483

Referring to the consultation on a planning application dated 23 October 2024 referenced above, in the vicinity of the A2 that forms part of the Strategic Road Network, notice is hereby given that National Highways' formal recommendation is that we:

- ~~a) offer no objection (see reasons at Annex A);~~
- b) recommend that conditions should be attached to any planning permission that may be granted (see Annex A – National Highways recommended Planning Conditions & reasons);**
- ~~c) recommend that planning permission not be granted for a specified period (see reasons at Annex A);~~

~~d) recommend that the application be refused (see reasons at Annex A)~~

Highways Act 1980 Section 175B is not relevant to this application.¹

This represents National Highways' formal recommendation and is copied to the Department for Transport as per the terms of our Licence.

Should the Local Planning Authority propose not to determine the application in accordance with this recommendation they are required to consult the Secretary of State for Transport, as set out in the [Town and Country Planning \(Development Affecting Trunk Roads\) Direction 2018](#), via transportplanning@dft.gov.uk and may not determine the application until the consultation process is complete.

The Local Planning Authority must also copy any consultation under the 2018 Direction to Planningse@nationalhighways.co.uk.

This response and all comments outlined herein are made in respect of planning matters only in National Highways' position as a statutory planning consultee, and does not confer any proprietary rights nor amount to the giving or refusal of consent, assent, approval, or awareness of or by National Highways in or of any other aspects or matters (including, but not limited to, the use of property belonging to National Highways). If anyone wishes for National Highways to consider any aspects which do not relate to planning submissions, they should call our contact centre on 0300 123 5000.

Signature:



Date: 29 August 2025

Name: Nigel De Wit

Position: Spatial Planner

National Highways

Bridge House, 1 Walnut Tree Close, Guildford, Surrey, GU1 4LZ

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¹ Where relevant, further information will be provided within Annex A.

Annex A **National Highways' assessment of the proposed development**

National Highways has been appointed by the Secretary of State for Transport as a strategic highway company under the provisions of the Infrastructure Act 2015 and is the highway authority, traffic authority and street authority for the Strategic Road Network (SRN). The SRN is a critical national asset and as such we work to ensure that it operates and is managed in the public interest, both in respect of current activities and needs as well as in providing effective stewardship of its long-term operation and integrity.

Recommend that conditions should be attached to any planning permission that may be granted: Reasons

We will be concerned with proposals that have the potential to impact on the safe and efficient operation of the SRN, in this case, particularly within the vicinity of the A2.

Since the submission of our previous holding recommendation of 3 June 2025, the applicant has shared information with National Highways that has addressed the SRN-related matters we raised.

This information includes proposed mitigation to the A227 Wrotham Road/A2 Roundabout (westbound off-slip) which has been subject to a Road Safety Audit (RSA) (Stage 1) process. As the overseeing organisation, we are satisfied that the RSA Stage 1 process has been undertaken in accordance with the Design Manual for Roads and Bridges (DMRB) GG 119 document.

Given the proximity of the site to the SRN (A2) we have recommended conditions in respect of geotech, drainage, lighting, and signage matters. We have also recommended a condition for a Construction Environmental Management Plan to be prepared, approved and implemented.

Having assessed application 20240856, we are content that the proposal, if permitted, would not have an unacceptable impact on the safety, reliability, and/or operational efficiency of the Strategic Road Network in the vicinity of the site (A2) provided that the following conditions are imposed, reflecting DfT Circular 01/2022 and NPPF 2024 paras. 115-118.

1. A227 Wrotham Road/A2 Roundabout (westbound off-slip) Mitigation

Condition: Prior to the occupation of the development hereby permitted, the improvement scheme identified for the A227 Wrotham Road/A2 Roundabout (westbound off-slip) as shown in approved drawing ref: 22052-MA-XX-DR-C-0102 P07 in the Stage 1 Road Safety Audit Response Report (29 August 2025), is completed and open to traffic.

Reason: To mitigate the impact of the development on the A2, in accordance with paragraph 116 of the NPPF (December 2024) and paragraph 40 of the DfT Circular 01/2022.

2. Construction Environmental Management Plan (CEMP)

Condition: No works shall commence on the site hereby permitted (including site clearance or preparation) until the details of a Construction Environmental Management Plan have been submitted to and approved in writing by the local planning authority (who shall consult with National Highways). Thereafter the construction of the development shall proceed in strict accordance with the approved Construction Environmental Management Plan unless otherwise agreed in writing by the local planning authority (who shall consult National Highways).

Reason: To ensure that the A2 continues to be an effective part of the national system of routes for through traffic in accordance with section 10 of the Highways Act 1980 and to satisfy the reasonable requirements of road safety.

Informative: The CEMP shall include details (text, maps, and drawings as appropriate) of the scale, timing and mitigation of all construction related aspects of the development. It will include but is not limited to: site hours of operation; sheeting of loose loads; and wheel washing and other facilities to prevent dust, dirt, detritus etc from entering the public highway (and means to remove if it occurs).

3. Geotech

Condition: Prior to the commencement of any excavation works and landscaping works, proposals for managing geotechnical risk in accordance with Design Manual for Roads and Bridges (DMRB) CD622 shall be submitted to and agreed in writing by the Local Planning Authority (in consultation with the Highway Authority for the A2). No works covered by the Geotechnical Design Report should be commenced until the relevant certification for that part of the works has been completed.

Reason: To mitigate any adverse impact from the development on the A2 in accordance with Department for Transport (DfT) Circular 01/2022.

4. Drainage

Condition: No surface water shall be permitted to run off from the development hereby permitted on to the Strategic Road Network or into any drainage system connected to the Strategic Road Network. No drainage connections from any

part of development hereby permitted may be made to any Strategic Road Network drainage systems.

Reason: In the interest of the safe and efficient operation of the A2, and to protect the integrity of the Trunk Road drainage asset in accordance with DfT Circular 01/2022.

5. Lighting

Condition: Prior to the occupation of the development hereby permitted, the external lighting, as show in drawing ref: BP186.1, shall be constructed and remain in a downwards facing position at all times and maintained in perpetuity accordingly.

Reason: To mitigate any adverse impact from the development on the A2 and to satisfy the reasonable requirements of road safety.

6. Signage

Condition: No part of the development hereby permitted shall commence until details of the signage strategy for the permitted development have been submitted to and approved in writing by the Local Planning Authority in consultation with National Highways. The approved signing strategy shall be implemented in accordance with the approved plans and maintained in perpetuity.

Reason: To ensure that the A2 continues to be an effective part of the national system of routes for through traffic in accordance with section 10 of the Highways Act 1980 and to satisfy the reasonable requirements of road safety.

Standing advice to the local planning authority

The Climate Change Committee's [2022 Report to Parliament](#) notes that for the UK to achieve net zero carbon status by 2050, action is needed to support a modal shift away from car travel. The NPPF supports this position, with paragraphs 77 and 110 prescribing that significant development should offer a genuine choice of transport modes, while paragraphs 109 and 115 advise that appropriate opportunities to promote walking, cycling and public transport should be taken up as part of a vision-led approach.

Moreover, the carbon reduction hierarchy (avoid-switch-improve) as set out in clause 4.3 of PAS2080:2023 promotes approaches and measures to minimise resource consumption and thereby reduce carbon emissions.

These considerations should be weighed alongside any relevant Local Plan policies to ensure that planning decisions are in line with the necessary transition to net zero carbon.