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Sent by e-mail to: planning.consultation@gravesham.gov.uk

Dear Sir/Madam

Re: Emerging Local Plan Partial Review, Site Allocations and Development Management Policies (Regulation 18 - Stage 2) Consultation – Representations on behalf of BP Oil (UK) Ltd

I write on behalf of BP Oil (UK) Ltd (BP) in response to the above consultation exercise. BP own the Tollgate Hotel site, Watling Street, which is identified within the consultation papers as a proposed commercial allocation, reference GB07. This previously developed land, adjacent to the A2's junction with Wrotham Road, is currently vacant and, as the local authority will be aware, my client has development aspirations to bring it back into beneficial use. BP is therefore a key stakeholder in the plan-making process, and these representations are submitted on this basis.

The Site

The site is located to the north of, and alongside, the eastbound slip road on to the A2 dual carriageway. As previously confirmed, it lies adjacent to the A2's junction with Wrotham Road, and benefits from an existing access onto the northern roundabout serving the junction. It is therefore easily accessible to traffic travelling in both directions on the A2, and north and southbound traffic entering and leaving Gravesend on Wrotham Road. In this context, it is ideally placed for roadside development serving both the local and strategic highway network.

Further, the site accommodates a number of vacant but maintained buildings, including:

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

The rest of the site accommodates maintained hardstanding, other paved areas and amenity landscaping, all in the curtilage of the above buildings, and largely enclosed by them. In this context, the entire site is previously

developed land, as defined by the National Planning Policy Framework, given that the site is all land that is occupied by permanent structures and fixed surface infrastructure associated with them.

Local Authority Evidence Base

It is noted that, as is appropriate, the consultation is supported by a suite of evidence base documents, including the Stage 2 Green Belt Report by LUC. This has been reviewed, and the site lies within a relatively lengthy strip of land between the former route of Watling Street and the replacement dual carriageway running to the south of it (reference: GR1). LUC's findings relative to this strip of land in terms of the purposes of including land within the Green Belt are commented on below:

- **Purpose 1** – GR1 is found to have moderate contribution to checking the unrestricted sprawl of large built-up areas. However, as the analysis recognises, the A2 (to the south) is an urbanising influence and the land parcel adjoins the built-up area of Gravesend to the north. In this context, the land parcel offers little in terms of checking the sprawl of the built-up area, a matter confirmed later in the analysis relative to the impact of releasing this parcel from the Green Belt (addressed below). Further, the analysis relative to this matter does not recognise that there are a number of developed sites within this land parcel, not least the Tollgate hotel site and the Cyclorama facility to its west. In this context, the built-up area has already “sprawled” into this parcel of the Green Belt. GR1, therefore, makes a limited contribution (as a whole) and no contribution (relative to sites that are already developed) to purpose 1 of including land within the Green Belt.
- **Purpose 2** – it is agreed that the land parcel does not make any contribution to preventing neighbouring towns from merging into one another.
- **Purpose 3** – it is indicated that this land parcel has a relatively limited contribution to this purpose, but as with purpose 1 this is considered to be overstated. The presence of the A2 cuts this land parcel from the wider countryside, and as previously confirmed the land parcel accommodates urbanising influences in places, not least the Tollgate hotel site. GR1 therefore makes no contribution to purpose 3, and this is particularly the case on the parts of it that are previously developed.
- **Purpose 4** – it is agreed that the land parcel does not make any contribution to the setting and special character of historic towns.
- **Purpose 5** – the comments relative to this purpose are noted, however it should be recognised as a general point that the redevelopment of the Tollgate site would recycle urban land (given the extent of existing development on the site, and its relationship to the built-up area of Gravesham), notwithstanding its current location in the Green Belt.

In terms of the other commentary relative to GR1 in the report, it is agreed that releasing GR1 from the Green Belt would result in a distinct and consistent boundary between the inset settlement and the Green Belt, by way of the A2. However, it is not agreed that a reduced release of land of part of GR1 would not result in less harm to Green Belt purposes (notwithstanding the report's findings that the overall harm or releasing GR1 would be low-moderate in any event). In the context of the above commentary, releasing land from the Green Belt that already accommodates significant levels of development, such as the Tollgate site, would not have any impact on the purposes of including land in the Green Belt, and would cause no harm to it.

Proposed Allocation GB07

As previously noted, the site is identified in the consultation papers as proposed allocation GB07, and the plan indicates that the developed area is 1ha (gross) and the anticipated form of development on site is “commercial”. In the context of the above comments relative to the local authority’s evidence base, and my client’s development aspirations for the Tollgate site, the proposed allocation is strongly supported by BP, and the opportunity to discuss more detailed terms for the allocation would be welcomed. However, in the interim, my client requests that the development to be delivered through the allocation be treated flexibly, as development proposals are prepared in light of market demand.

Although, for obvious reasons, my client’s primary interest is the delivery of a petrol filling station to serve an identified need arising from strategic traffic on the A2, other roadside related uses might also be sought in addition to this to create a more comprehensive service area, potentially including a restaurant/drive-thru and or a hotel. I would be happy to discuss this further, in due course, with policy officers.

General commentary relative to proposed Green Belt policies

Given the site’s proposed allocation for commercial development, and in light of the commentary above relative to the local authority’s evidence base, the Tollgate site should be removed from the Green Belt.

However, if for whatever reason this is not pursued by the local authority, it is essential that clear allowance is made for development on allocated sites within general Green Belt policies (in particular draft policies GB5, GB6 and GB7). Specifically, these policies should be clear that the restrictions placed on development within the Green Belt are not applicable to allocated sites, and that development on allocated sites in the Green Belt should be assessed in the context of the terms of their allocation.

I trust that the above is self-explanatory and acceptable to the authority, and I look forward to further engagement through the plan-making process, and I would be grateful if, in due course, an officer could contact me to discuss appropriate terms for the proposed site allocation. In any event, I would be grateful if you could keep me informed of future consultation exercises and, if you have any questions or comments in the interim, please do not hesitate to contact me on the details below.

Yours faithfully

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