



REPORT TO ACCOMPANY A REQUEST FOR
SCREENING AND SCOPING OPINIONS

Planning application to allow for the installation of two
additional bitumen tanks, load out gantry, the installation of
a bitumen emulsion plant and alternative car parking

**Imperial Wharf, Clifton Marine Parade, Gravesend, Kent,
DA11 0DY**

Report prepared on behalf of:
FM Conway Limited



Report date:
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This submission was prepared by PDE Consulting Limited on behalf of
FM Conway Limited

Gravesend Borough Council



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1. INTRODUCTION

- 1.1 FM Conway Limited (the Applicant) propose to submit a planning application for the installation of two additional bitumen tanks, load out gantry, the installation of a bitumen emulsion plant and alternative car parking on land at Imperial Wharf, Clifton Marine Parade, Gravesend, Kent, DA11 0DY. Throughout this Screening Request, this is referred to as the Proposed Development.
- 1.2 PDE Consulting Limited has been appointed to prepare the Planning Application for the Proposed Development in liaison with company representatives and external consultants.
- 1.3 The application site (the Site), as shown outlined red on Drawing Number KD.IMP.D.001 extends to approximately 0.7 hectares and is situated on the south bank of the River Thames, approximately 0.9 kilometres to the northwest of the centre of Gravesend. The Site's immediate surrounds consist of industrial and retail development, located to the south, east and west, with the River Thames to the north.
- 1.4 The Proposed Development comprises of four main aspects: the two additional bitumen storage tanks, the load out gantry, the emulsion plant, and the provision of alternative car parking.
- 1.5 The two additional bitumen storage tanks will be located on an area of land currently used for car parking, located to the south of Clifton Marine Parade. The emulsion plant will be located adjacent to the east of the Technology Centre, contained within the matrix of the already built development, with the load out gantry located to the west of The White House. Alternative car parking provision will be made on land to the west of the proposed bitumen storage tanks, on the opposite side of Clifton Marine Parade. New dedicated HGV parking is also proposed on land immediately west of the proposed bitumen storage tanks and on land to the west of the new load out gantry.
- 1.6 The wider land under the control of the Applicant is already used for the storage of highway grade bitumen which is imported via shipping tankers through the existing deep water jetty facility. The stored bitumen is subsequently distributed via road.
- 1.7 Vehicular access to and from the Site is gained via Clifton Marine Parade, from where vehicles can travel onto the wider highway network via Thames Way which leads towards the A2.
- 1.8 The land which is the subject of this application falls within the freehold ownership of the Applicant, who have occupied the Site for a number of years and have historically used this land for a variety of purposes in support of their wider consented operations associated with the importation and storage of bitumen products. It is considered, therefore, that this land forms part of the wider planning unit in association with the Applicant's established operations at Imperial Wharf. Thus the Proposed Development essentially comprises a redistribution of the Applicant's existing facilities together with some new infrastructure.
- 1.9 The purpose of the Proposed Development is, in essence, to increase the wider facility's resilience through the provision of additional bitumen storage capacity. This will safeguard against delays in bitumen shipments and ensure a consistent supply of bitumen which is required as part of asphalt production, meeting the region's needs for road building and maintenance.
- 1.10 The proposed scale and nature of the development at the Site is such that a formal assessment of its environmental effects may be required in pursuance of the Town and Country Planning (Environmental Impact Assessment) Regulations 2017.

- 1.11 The first stage of undertaking an Environmental Impact Assessment is to request an opinion from the relevant planning authority as to whether an Environmental Impact Assessment is required or not and this request is usually called a Screening Request which will give rise to a Screening Opinion.
- 1.12 The second stage of the process, if it has been deemed that the proposed development is caught by the legislation, involves a process whereby the extent and the parameters of the Environmental Impact Assessment are determined. The process involves the Applicant providing sufficient information to the planning authority for them to be able to consider the likely significant effects of the proposal, which results in the planning authority providing a detailed response as to what the Environmental Impact Assessment should focus upon and this response is usually termed a Scoping Opinion.
- 1.13 Due to the nature and scale of the development outlined above, it is likely that an Environmental Impact Assessment will be required and we invite Gravesham Borough Council (GBC) to confirm that this is the case.
- 1.14 Accepting that the Proposed Development is caught by the legislation, then the second stage of the process is to submit a Scoping Request which would ordinarily lead to the planning authority providing a Scoping response within five weeks of receipt of the initial request.
- 1.15 The purpose of this submission is, therefore, to invite GBC to confirm that the Proposed Development is caught by the regulations and to confirm this in accordance with Regulation 5. It is further required that GBC provide a Scoping Opinion in accordance with Regulation 15.

2. EXISTING DEVELOPMENT

- 2.1 The Site and the wider bitumen storage facility and wharfage are under the control of the Applicant. The Site and associated land have a long history associated with industrial development.
- 2.2 Historically, the Site was home to the Imperial Paper Mills, which operated from the early 1900's until the mid-1980s to process paper pulp into newsprint. Imperial Wharf was used as an ancillary wharf in connection with the paper manufacture, although the extent of its use is not known.
- 2.3 The Imperial Paper Mills site, including the wharf/jetty, was acquired by TBF Thompson following closure of the paper mills, during the 1980's, and part of the site was temporarily used for the manufacture of asphalt pending its redevelopment.
- 2.4 Planning permission was granted in 1989 for three units of offices on the site and details of their siting and design were approved in 1993 in accordance with planning permission reference 19930609 but the development was never implemented.
- 2.5 Planning application reference GR/2001/906 was submitted in 2001 for the continued use of land for the open storage of aggregates in connection with the wharf activities at Imperial Wharf. The application was subsequently refused on 07 March 2002.
- 2.6 Planning application reference 20040373 was submitted to GBC seeking the construction of 270 flats each with car parking space and a café/bar/restaurant and home owners mooring berths on the old Imperial Paper Mills jetty. Planning permission was subsequently refused and dismissed on appeal in February 2007. The application was refused on the grounds that it did not conform to the local plan and would have resulted in the loss of active employment land and the displacement of jobs.
- 2.7 Planning permission reference 20160800 was approved by GBC on 29 June 2018 to enable retrospective permission for the retention of four additional bitumen storage tanks and ancillary equipment including activated carbon filter unit, mixing plant and enclosed retaining bund wall.

3. PROPOSED DEVELOPMENT

- 3.1 The Proposed Development is seeking permission for the installation of two additional bitumen tanks, load out gantry, the installation of a bitumen emulsion plant and alternative car parking on land at Imperial Wharf, Clifton Marine Parade, Gravesend, Kent, DA11 0DY.
- 3.2 The Proposed Development, as shown on Drawing Number KD.IMP.D.004, comprises of four main aspects: the two additional bitumen storage tanks; the load out gantry; the emulsion plant; and the provision of alternative car parking.
- 3.3 The two additional bitumen storage tanks will be located on an area of land currently used for car parking, located to the south of Clifton Marine Parade. The emulsion plant will be located adjacent to the east of the Technology Centre, contained within the matrix of the already built development, with the load out gantry located to the west of The White House. Alternative car parking provision will be made on land to the west of the proposed bitumen storage tanks, on the opposite side of Clifton Marine Parade. New dedicated HGV parking is also proposed on land immediately west of the proposed bitumen storage tanks and on land to the west of the new load out gantry.
- 3.4 As mentioned previously, the purpose of the Proposed Development is, in essence, to increase the wider facility's resilience through the provision of additional bitumen storage capacity. This will safeguard against delays in bitumen shipments and ensure a consistent supply of bitumen for the region's needs.
- 3.5 The land which is the subject of this application falls within the freehold ownership of the Applicant, who have occupied the Site for a number of years and have historically used this land for a variety of purposes in support of their wider consented operations associated with the importation and storage of bitumen products. It is considered, therefore, that this land forms part of the wider planning unit in association with the Applicant's established operations at Imperial Wharf. Thus the Proposed Development essentially comprises a redistribution of the Applicant's existing facilities together with some new infrastructure.
- 3.6 The Proposed Development will operate in much the same way as the existing bitumen storage facility has done so to date, albeit, with the additional new infrastructure and some additional HGV movements. Highway grade bitumen will be imported to the Site via shipping tankers, using the existing deep water jetty, from where the bitumen will be pumped ashore using the ship's own onboard pumps. At all times, the bitumen is either within the ship's hold, within the insulated and heated storage tanks and/or is being pumped to the lorry tanker loadout facility, before leaving site.
- 3.7 On site, the bitumen is conveyed within sealed and insulated steel pipe work operated via a manned control room. At all stages, the average temperature of the bitumen is maintained at or around 160 degrees Celsius.
- 3.8 Bitumen leaves the facility in dedicated road tankers with an average payload of 26 tonnes. The bitumen is consumed both by the Applicant, at its existing asphalt operations and also offered to the wider market. This could be anywhere up to 50 radial miles from Imperial Wharf.
- 3.9 Although the UK demand for bitumen remains relatively constant at around 1.4 -1.6 million tonnes per year, the need for additional storage capacity stems from the fact that there are only two UK refineries that produce bitumen, these are located at Eastham in Ellesmere Port and Lindsay in Humberside, with the rest of the demand met by importation from mainland Europe. However there

have also been significant numbers of European refinery closures between 2009-2015, meaning that the supply of bitumen is less reliable.

- 3.10 With respect to HGV movements, extant planning consent places no restriction on HGV movements to and from the Site. Based upon the existing levels of trading, there are approximately 15 to 20 loads out per day (i.e. 30 to 40 HGV movements in total). These movements are spread across the 24 hour operation of the Site.
- 3.11 The Proposed Development is likely to generate a modest increase in the numbers of HGVs, averaging 5 additional loads out per day (i.e. 10 total movements). This increase stems from forecast growth in bitumen demand, with additional asphalt plants to supply.
- 3.12 It is not proposed to alter the existing access arrangements at the Site. HGVs associated with the Proposed Development will continue to access the Site in a similar manner in which they do so at present. It is considered that the small increase in daily HGV movements can be safely accommodated within the local highway network and will not result in any adverse impact.

Bitumen Storage Tanks

- 3.13 The proposed additional storage tanks shall be equal in size to the largest tanks already consented at the facility and the additional storage capacity equates to approximately 3,000 tonnes of bitumen per tank. The elevations of the new tanks are shown on Drawing Number KD.IMP.D.005.
- 3.14 The location of the two additional storage tanks has been selected to enable the tanks to fit in with the surrounding medium to large scale industrial, commercial and retail structures, minimising as far as reasonably possible, any adverse visual impacts. By locating the tanks away from the more prominent river frontage, they are visually more integrated within the surrounding topography and built development.
- 3.15 The new tanks will be linked to the wider facility via a 10 inch pipeline which will be installed beneath Clifton Marine Parade. It is proposed to install this pipeline below ground in order to further limit any new visual features.
- 3.16 The tanks shall sit upon a sealed concrete pad surrounded by a 4.5m high bund wall which is designed to provide mitigation in the unlikely event of a spillage.

Alternative Car Parking

- 3.17 To compensate for the loss of car parking space from the area where the two new tanks are to be located, parking will be provided on land located to the west of the proposed bitumen storage tanks, on the opposite side of Clifton Marine Parade. This area is already surfaced with road plainings and has historically been used for storage and additional parking as and when required. It is not envisaged that any significant enabling works would be required to facilitate the use of this land for car parking.
- 3.18 The alternative car park shall make provision for approximately the same number of spaces which shall have been lost from the area upon which the new bitumen storage tanks are to be located. There shall, therefore, be no long-term loss of parking provision at the facility.

- 3.19 Dedicated parking provision is proposed for HGVs on land to the west of the proposed bitumen storage tanks and on land to the west of the proposed new load out gantry. Both of these areas of land have historically been used for general storage purposes and additional parking as and when required.

Emulsion Plant

- 3.20 In addition to the new bitumen storage tanks, it is proposed that a bitumen emulsion plant be constructed on land to the east of the existing Technology Laboratory. The new bitumen emulsion plant is illustrated on Drawing Number KD.IMP.D.010.
- 3.21 The emulsion plant will be used to process the imported bitumen in order to create an emulsion which is used during road surfacing and repairs. The emulsion is used to treat surfaces before asphalt surfacing is laid so that the asphalt can bond to the underlying or adjacent surfaces.
- 3.22 The emulsion plant itself will be housed within a shipping container with the bitumen emulsion produced fed into two storage tanks located adjacent to the emulsion plant where the finished product shall be stored prior to onward export via HGV.

Load Out Gantry

- 3.23 A new load out gantry is to be erected on land to the west of The White House. The load out gantry is illustrated on Drawing Number KD.IMP.D.011. The location of the gantry will be on an area of land which is already laid to hardstanding with good access for HGVs. The gantry shall be used to load HGVs with bitumen products for onward distribution and shall be supplementary to the existing loading facilities which are located within the eastern part of the wider Imperial Wharf Site.
- 3.24 Once constructed, HGVs entering the Site shall either proceed down Clifton Marine Parade to the existing loading facilities or turn into the Site using an existing access point to the west of the White House where they shall proceed to the new gantry. Once loaded, HGVs will depart this area via the same access point.
- 3.25 Historically this land has been used for HGV parking and general storage in connection with the Applicant's wider consented operations.

4. ENVIRONMENTAL EFFECTS

- 4.1 Schedule 4 of The Town and Country Planning (Environmental Impact Assessment) Regulations 2017 states that the information for inclusion in an environmental statement should include;-

“A description of the factors specified in regulation 4(2) likely to be significantly affected by the development: population, human health, biodiversity (for example fauna and flora), land (for example land take), soil (for example organic matter, erosion, compaction, sealing), water (for example hydromorphological changes, quantity and quality), air, climate (for example greenhouse gas emissions, impacts relevant to adaptation), material assets, cultural heritage, including architectural and archaeological aspects, and landscape”.

- 4.2 Regulation 18 (4) also states that an environmental statement must:

“Include the information reasonably required for reaching a reasoned conclusion on the significant effects of the development on the environment, taking into account current knowledge and methods of assessment”.

- 4.3 In accordance with the 2017 EIA regulations and EIA guidance, the Environmental Statement must, therefore, contain information that relates to likely significant environmental effects of the Proposed Development and which can reasonably be requested. It can therefore be considered that where the development will have an effect upon a factor which is less than significant, the topic does not need to be included within the EIA.
- 4.4 At this preliminary stage it is considered that the key topics on which the Environmental Statement (ES) shall focus are as follows:

Highways and Traffic

- 4.5 The possible effects on highways and traffic may include:
- i. Impacts on local highways.
 - ii. Impacts on the wider road network.
 - iii. Effects on the amenity of local residents.
- 4.6 There will be a small increase in HGV movements associated with the export of bitumen products from the Site, on average 5 additional HGVs per day (i.e. 10 movements) associated with forecast increases in bitumen demand and an increase in the number of asphalt plants to supply.
- 4.7 The Proposed Development does not seek to alter the existing access arrangements at the Site and no difficulties have been experienced in the use of the access since the facility was permitted. HGVs will continue to access the Site in the same manner in which they do so at present.
- 4.8 Given the modest increase in traffic generated by the Proposed Development and the existing good access links to the Site it is highly unlikely that the Proposed Development would result in a severe residual cumulative impact upon the road network and is therefore acceptable on highway grounds.
- 4.9 Nevertheless, a Transport Assessment will be undertaken to fully assess how the development traffic will be accommodated within the local highway network and to demonstrate that there would be no adverse impacts.

Archaeology/ Cultural Heritage

- 4.10 It is considered unlikely that the Proposed Development would result in any adverse impacts with respect to archaeology, given the industrial location and historical disturbance. However, the proposals do lie within proximity to two conservation areas and there is potential for direct or indirect effects upon off Site statutorily designated heritage assets.
- 4.11 Views from the Lansdown Square Conservation Area to the Site are highly filtered or blocked by modern commercial development that abuts the Conservation Area boundary. It is therefore considered that the Proposed Development will not cause an adverse cumulative effect to this area. The views northwards from Overcliffe Conservation Area are dominated by infrastructure, and commercial and industrial development. The Proposed Development would be absorbed into this existing backdrop.
- 4.12 Pre-application planning advice (reference PRE20210011) sought from GBC in respect of the Proposed Development does highlight the need to undertake a desk based assessment.
- 4.13 A Cultural Heritage Assessment would be submitted with any planning application to demonstrate that any impacts upon surrounding heritage assets would not be significant and that any effects are adequately mitigated.

Air Quality/ Odour

- 4.14 In terms of air quality, we do not consider there will be any negative impacts upon any sensitive receptors from the Proposed Development. Activated carbon filters were fitted to the existing facility in 2017 which utilise absorption to remove odour coming from the tanks' vent pipes. The two additional storage tanks will also make use of activated carbon filters.
- 4.15 Any application for the Proposed Development would be supported by an air quality and odour assessment comprising a review of existing air quality and the compliance of the proposed operations with legislation and government guidelines.

Landscape and Visual Impact

- 4.16 There is potential for the Proposed Development to have an adverse visual impact within the locality. The location of the proposed bitumen storage tanks has been selected to enable the tanks to fit in with the surrounding medium to large scale industrial, commercial and retail structures. By locating the tanks away from the more prominent river frontage, they are visually more integrated within the surrounding topography and built development.
- 4.17 Based upon the design and location of the Proposed Development, it is considered that it would not represent a discordant new element/ feature and is capable of assimilation, without resulting in the deterioration or adverse significant change to localised visual receptors or designated assets / areas.
- 4.18 Any application for the Proposed Development would be accompanied by a Landscape and Visual Impact Assessment which would consider any impacts from the development upon the surrounding townscape and conservation areas. The assessment would also comprise a number of photomontages illustrating views towards the Site to demonstrate how the development would fit within the existing built development.

Hydrology/ Flood Risk

- 4.19 The Site is situated within Flood Zone 2 in an area benefitting from the Thames tidal defences. The Site comprises of existing hard surfaced areas with existing drainage infrastructure. The proposed bitumen storage tanks will be sited on an impermeable base surrounded by a 4.5m high bund wall which shall provide mitigation in the unlikely event of a spillage.
- 4.20 Pre-application planning advice sought from GBC in respect of the Proposed Development states that a Flood Risk Assessment (FRA) should be submitted alongside any planning application for the Proposed Development.
- 4.21 The pre-application planning advice received also states that there may be a need to consider SUDS. Given the nature of the existing site and the Proposed Development, it is not considered that any sustainable drainage systems would be necessary nor appropriate.
- 4.22 It is proposed that a planning application would include an FRA which would comprise a review of Environment Agency hydrological data, existing drainage and topography in order to demonstrate that the development is resilient to flooding and can be accommodated without increasing flood risk. A surface water drainage strategy would also be submitted.

Noise

- 4.23 In terms of noise, we consider that the Proposed Development will not result in any adverse impacts over and above the current noise environment at the facility. The Site is located within a developed area, surrounded by a number of industrial, commercial and retail developments. There may be some noise impact during the construction phase of the development and associated activity, however, these impacts will be temporary in nature and not significant.
- 4.24 It is proposed that a Noise Assessment would be submitted with a planning application for the Proposed Development to demonstrate that noise levels would be acceptable, and to outline any mitigation or noise control measures considered necessary.

Contaminated Land

- 4.25 Given the industrial setting of the Site and previous uses of the land, there is potential for contamination to be present within the Site. To construct the proposed bitumen storage tanks and emulsion plant, there will be the need to undertake some foundation works.
- 4.26 An application for the Proposed Development would therefore be accompanied by a Phase 1 Contaminated Land Assessment which shall comprise a review of historical land uses, the potential contamination which may be present and any mitigation measures which may need to be implemented.

Ecology

- 4.27 The Site comprises of previously developed, hard surfaced areas which are highly unlikely to contain any features of ecological interest. It is considered unlikely, therefore, that the Proposed Development would have any adverse ecological impact in this regard.

- 4.28 Nevertheless, any application for the Proposed Development would include an ecological assessment which would contain a review of the Site and any potential ecological sensitivities, with specific regard to the marine environment.

Other Matters

- 4.29 The Environmental Statement will also consider other potentially relevant matters, including the potential socioeconomic effects of the development, the main alternatives to the Proposed Development and options in terms of scheme design. Consideration will also be given to the potential cumulative effect of the development, having particular regard to the totality of the whole development as well as the potential for the effects to be experienced in combination with those of other developments.

Socio Economics

- 4.30 The Proposed Development will secure existing employment at the Site and will support the existing supply of bitumen products to the region. This includes 7 asphalt plants owned and operated by the Applicant, producing 1.3 million tonnes of asphalt for local authorities, National Highways (formerly Highways England) and private sector developments.
- 4.31 Consideration will be given to socio-economic effects within the ES, including the likely local employment and other economic benefits associated with the Proposed Development at the local and regional level.

Alternatives

- 4.32 Regulation 18 of The Town and Country Planning (Environmental Impact Assessment) Regulations 2017, Paragraph (d) states that the following should be included within the Environmental Statement:

“A description of the reasonable alternatives studied by the developer, which are relevant to the proposed development and its specific characteristics, and an indication of the main reasons for the option chosen, taking into account the effects of the development on the environment.”

- 4.33 Consideration will therefore be given to the alternative designs developed and those discounted in identifying the preferred design and layout for the Site.

Cumulative Effects and Interactions

- 4.34 Cumulative effects are those which could arise from both the Proposed Development and other existing developments.
- 4.35 Identification of other committed developments within the vicinity of the scheme will be undertaken. An evaluation of any identified developments will be undertaken to determine whether cumulative effects are likely.
- 4.36 Other issues will require consideration, including such matters as may be identified as a result of consultation with interested parties through both the consideration of this Screening and Scoping Request and ongoing discussion. These other matters may include:

- i. Land Use and Rights of Way.
- ii. Existing and proposed services.

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5. OTHER ENVIRONMENTAL EFFECTS SCOPED OUT

- 5.1 The following topics are proposed to be scoped out of the EIA process as they are not likely to have significant environmental impacts:

Vibration

- 5.2 The Proposed Development does not seek to enable any operations which are a significant source of vibration such as blasting, drilling or piling. Consequently, it is not considered necessary to incorporate an assessment of vibration with any planning application submitted for the Proposed Development and therefore has been scoped out of the EIA process.

Population and Human Health

- 5.3 Potential impacts upon population and human health associated with developments are commonly addressed as part of assessments undertaken to address noise, air quality, and flood risk.
- 5.4 The Proposed Development is not likely to have significant negative impacts to human health as a result of flood risk, noise, air quality or accidents and disasters. The design of the Proposed Development incorporates a number of safety measures with regard to bitumen storage including allowance for overfilling. The existing safety systems and working practices will continue to be employed at the Site in light of the Proposed Development. No potentially significant impacts on human health are, therefore, anticipated.
- 5.5 The Proposed Development will continue to support jobs at the facility in accordance with the objectives of the Gravesham Local Plan Core Strategy which anticipates that the Site will remain in employment use over the Plan period with the Council supporting proposals for river-related employment.
- 5.6 The level of employment and locally sourcing of staff is not anticipated to have an impact on the population of the County, but will have a positive economic benefit.
- 5.7 A qualitative assessment of information collated via the other topic assessments will be undertaken and presented within the cumulative and combined effects section of the ES. It is therefore proposed that an assessment focussing upon population and human health be scoped out of the EIA process.

Climate

- 5.8 Impacts upon climate arising from a development include the emission of greenhouse gases. There will be a modest increase in HGV movements associated with the Proposed Development, but this is considered to represent a negligible impact with regard to emissions. It is therefore considered that there are limited greenhouse gas emissions arising from the Proposed Development and, hence, it is proposed to scope out this topic.
- 5.9 Potential impacts of climate associated with the Proposed Development are commonly addressed as part of the assessments undertaken dealing with each environmental factor i.e. flood risk. It is therefore proposed a specific assessment on climate change be scoped out of the EIA process.

Accidents and Hazards

- 5.10 It is considered that existing best practice measures and Environmental Management Systems (EMS) which currently govern operations at the facility are considered appropriate for the Proposed Development. The proposed additional bitumen storage tanks incorporate a safe working capacity, with allowance made for overfilling in the event of such an occurrence. It is therefore proposed that this topic be scoped out of the EIA process.

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6. THE ASSESSMENT PROCESS

The Assessment Reports

- 6.1 For each relevant topic a report will be prepared which will include the following where required:
- i. A description of present conditions.
 - ii. Details of any surveys completed.
 - iii. An assessment of the positive and negative impacts of the continuing and Proposed Development.
 - iv. A description of the measures recommended to mitigate any adverse effects.
 - v. A summary of the overall effects of the continuing development.
 - vi. Identification of a monitoring and review programme to evaluate the effectiveness of the mitigation measures.

Consultation

- 6.2 The environmental assessment process will be undertaken in full consultation with all relevant parties. Each technical issue requiring examination will be discussed with the relevant statutory authority. The intention will be to agree full details of the extent of any necessary investigations and the methods of assessing results. So far as is reasonably possible, agreement will also be sought on the conclusions drawn from the results of the investigations and proposals for any necessary mitigation.
- 6.3 Liaison will, similarly, be maintained with GBC to advise all parties of progress and invite comment.

Sequence of Events

- 6.4 The following sequence of events is envisaged leading up to the submission to GBC of the Environmental Statement and accompanying Planning Application for the Proposed Development as soon as reasonably practicable:
- i. Screening and Scoping Opinion sought from GBC and comments from the appropriate consultees.
 - ii. Complete initial surveys/baseline reports/draft proposals.
 - iii. Seek comments.
 - iv. Evaluate draft proposals and prepare draft environmental assessment reports.
 - v. Finalise Site development and design and prepare Planning Application and Environmental Statement.
 - vi. Submit Planning Application and Environmental Statement with a Non-Technical Summary.

7. OUTLINE OF THE ENVIRONMENTAL STATEMENT

7.1 The Environmental Statement shall comprise of the following:

Introduction

7.2 This shall include:

- i. The Applicant Company and its operations.
- ii. A summary of the statutory requirements for Environmental Impact Assessment and an outline of the process.
- iii. An outline of the scope of the Assessment.
- iv. A brief outline of the planning policy framework.

Project Description

7.3 This shall include:

- i. A full description of the Proposed Development including layout, imports and exports as well as the operation of the bitumen storage tanks and emulsion plant.

Alternatives Considered

7.4 This shall include:

- i. Consideration will be given to alternative options for the Proposed Development.

Highways and Traffic

7.5 This shall include:

- i. Provide a baseline report on present highway situation.
- ii. Review planning changes to highway network and their impact on the development.
- iii. Assess overall highway implications of the Proposed Development and identify any necessary mitigation measures.

Archaeology/ Cultural Heritage

7.6 This shall include:

- i. Examination of the Cultural Heritage context with reference to any Development Plan and other designations.
- ii. Assessment of any impacts upon the setting of nearby Conservation Areas.
- iii. Recommendations for mitigation including archaeological investigation if necessary.

Air Quality/ Odour

7.7 This shall include:

- i. Baseline assessment of current air quality parameters at sensitive locations around the Site.
- ii. Consider the impact of the Proposed Development on air quality/ odour and recommend mitigation where required.

Landscape and Visual Impact

7.8 This shall include:

- i. Examination of the landscape context with reference to any Development Plan designations.
- ii. Assess the baseline and the Proposed Development from key viewpoints including residential properties and public rights of way.
- iii. Assess the impact of the Proposed Development on the townscape and nearby Conservation Areas including definition of the extent of visibility, the significance of what is visible, the degree of change to the landscape.
- iv. Recommendations for mitigation and enhancement proposals if required.

Hydrology/ Flood Risk

7.9 This shall include:

- i. Review of the existing landform and drainage infrastructure.
- ii. Examination of Environment Agency Hydrology data and Site survey data.
- iii. Production of a flood risk assessment including recommendations for any possible mitigation measures to protect the water environment and to maintain satisfactory drainage at the Site.

Noise

7.10 This shall include:

- i. Baseline assessment of current noise parameters at sensitive locations around the Site.
- ii. Consider the impact of the Proposed Development on noise regimes and recommend mitigation where required.

Contaminated Land

7.11 This shall include:

- i. Review of any previous Site investigation reports and historical land uses with reference to historical mapping.
- ii. Examination of the current Site status and any influences upon ground conditions.

- iii. Discussion of expected ground and groundwater conditions within the local area.
- iv. Production of a Phase 1 contaminated land assessment report detailing any potential contamination present, the risk that any contamination may pose to the intended use of the Site and recommendations for any further investigation and mitigation.

Ecology

7.12 This shall include:

- i. Baseline assessment.
- ii. Identification of guidelines to safeguard ecological interests in the Proposed Development and provision of mitigation measures where required.

Other Matters

7.13 This shall include:

- i. Description/discussion of other matters.

Conclusions/Interaction and Cumulative Impact

7.14 All development proposals have an impact upon the environment and the potential to impact upon several areas of environmental interest. Consideration will, therefore, be given to the various interactions and the cumulative impact of the proposals when combined with other developments within the vicinity in drawing conclusions and recommendations for the Proposed Development.

Non Technical Summary

7.15 In accordance with the requisite regulations, a separate Non Technical summary of the Environmental Statement will be prepared to assist in the public consultation and determination process. This will give an accurate and balanced statement of the key information contained in the Environmental Statement.

8. PLANNING POLICY

- 8.1 While not specifically relevant to the provision of an Environmental Statement but relevant to an Environmental Impact Assessment, a detailed review of planning policy relevant to the Proposed Development shall be provided within the Planning Supporting Statement which will accompany the Environmental Statement and Non Technical Summary.
- 8.2 The Planning Policy framework applicable to the Proposed Development is comprised of the following:
- National Planning Policy Framework Revised July 2021
 - Gravesham Local Plan Core Strategy Adopted September 2014
 - Gravesham Local Plan First Review 1994

National Planning Policy Framework Revised July 2021

- 8.3 On 20 July 2021 the National Planning Policy Framework (NPPF) was revised to set out the government's planning policies for England and how these are expected to be applied.
- 8.4 The overarching principle which runs through the NPPF is the presumption in favour of sustainable development. Decision makers should have regard to this overarching principle when making planning decisions. There are three objectives to sustainable development as set out within the NPPF which are: an economic objective, a social objective and an environmental objective.
- 8.5 The three objectives should be delivered through the preparation and implementation of plans and the application of the policies contained within the NPPF and they are not criteria against which every decision can or should be judged. Planning policies and decisions should play an active role in guiding development towards sustainable solutions, but in doing so should take local circumstances into account, to reflect the character, needs and opportunities of each area.
- 8.6 The presumption in favour of sustainable development does not change the statutory status of the development plan in terms of decision making. Where a planning application conflicts with an up-to date development plan (including any neighbourhood plans that form part of the development plan), permission should not usually be granted. Local planning authorities may take decisions that depart from an up-to-date development plan, but only if material considerations in a particular case indicate that the plan should not be followed.

Gravesham Local Plan Core Strategy Adopted September 2014

- 8.7 The Core Strategy sets out the Council's spatial vision and strategic objectives for the Borough to 2028 and the policies which will deliver them. It identifies the main areas where major change is likely to take place and allocates sites which are key to achieving the strategy.
- 8.8 Policy CS01 of the Core Strategy states that planning applications that accord with the policies in the development plan for Gravesham will be approved without delay, unless material considerations indicate otherwise.

- 8.9 The Council will take a positive approach that reflects the presumption in favour of sustainable development contained in the National Planning Policy Framework and in this Core Strategy.
- 8.10 The Site is designated under Policy CS03 as an opportunity area. It is noted that Imperial Business Estate comprises sub-area 1.10 that is expected to remain in employment uses over plan period.
- 8.11 The Core Strategy also states that development proposals facilitating the expansion of river-related employment will be supported, particularly where these involve the use of the river for transport and/ or provide specialist training or other facilities intended to support the continued use of the River Thames as a major commercial waterway.

Gravesend Borough Council

9. CIRCULATION AND RESPONSE

- 9.1 This Screening and Scoping Request has been prepared by PDE Consulting Limited to be submitted to GBC who shall request opinions and information from a number of Statutory and Non Statutory consultees in respect of the proposed Planning Application and Environmental Statement.
- 9.2 Under Regulation 5 of the Town and Country Planning Environmental Impact Assessment Regulations 2017, as amended, this submission seeks confirmation from GBC that the Proposed Development should be subject to EIA.
- 9.3 Additionally, a Scoping Opinion from GBC for the Proposed Development is also sought. The intention is to clarify the scope of the Environmental Impact Assessment and the work required for the associated Environmental Statement.
- 9.4 Any relevant information and preliminary comments would be appreciated, particularly where this would assist in establishing the existing environmental conditions on and surrounding the Site against which predictions about future changes may be made.
- 9.5 In addition, it would be helpful if consultees could also provide names and addresses of any additional interested parties who they feel might wish to contribute to the Environmental Impact Assessment process in respect of the Proposed Development.

DRAWINGS

Drawing Number KD.IMP.D.001	Location Plan	Scale 1:25,000 @A3
Drawing Number KD.IMP.D.003	Current Situation	Scale 1:1,250 @A3
Drawing Number KD.IMP.D.004	Proposed Development	Scale 1:1,250 @A3
Drawing Number KD.IMP.D.005	Elevations – Proposed Silos, Bund Wall & Oil Heater	Scale 1:1,250 @A3
Drawing Number KD.IMP.D.010	Emulsion Plant Layout	Scale 1:1,250 @A3
Drawing Number KD.IMP.D.011	Truck Loading System	Scale 1:50 @A3



Location Plan

Legend

Planning Application Boundary

pde. consulting
limited
chartered surveyors

PROJECT
Imperial Wharf

DRAWING TITLE
Location Plan

DATE
November 2021

SCALE
1:25,000 @ A3

DRAWING No.
KD.IMP.D.001

DRAWING STATUS
FINAL



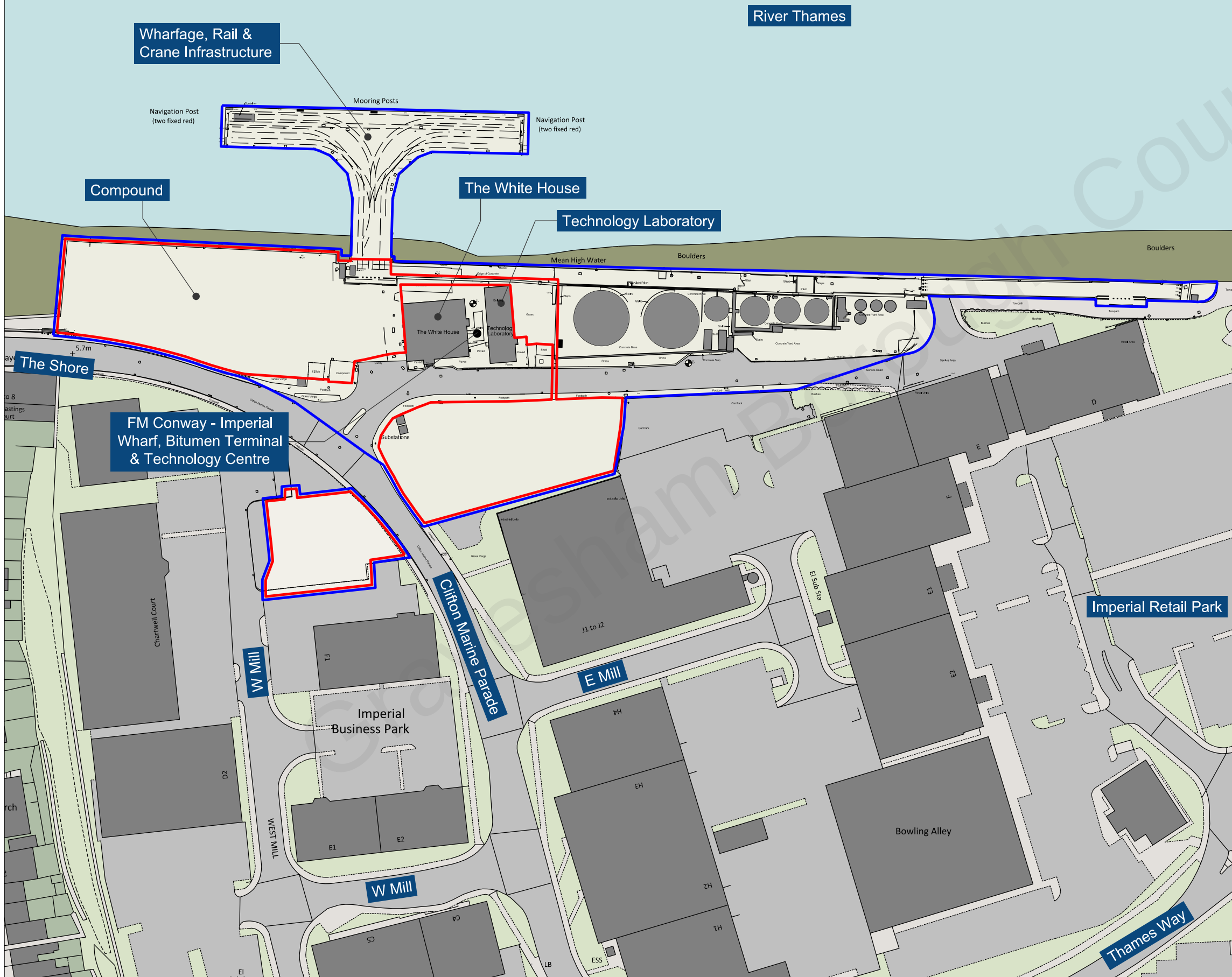
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Imperial Wharf

Current Situation / Immediate Site Context



Legend



Planning Application Boundary



Land Under the Control of the Applicant



Existing Buildings & Infrastructure within and surrounding the Site



PROJECT
Imperial Wharf

DRAWING TITLE

Current Situation / Immediate Site Context

DATE
November 2021

SCALE
1:1,250 @ A3

DRAWING No.
KD.IMP.D.003

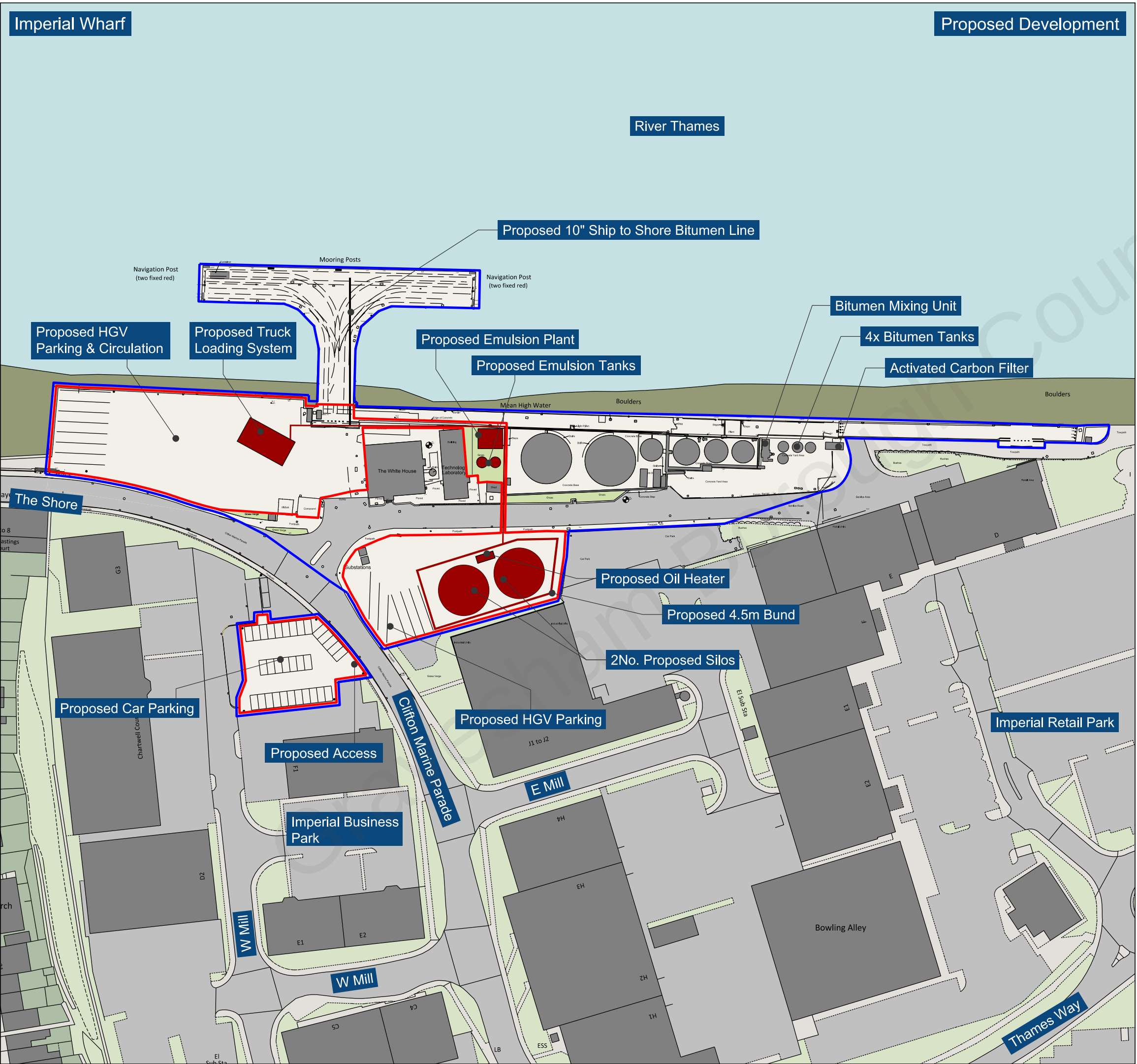
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Legend

- Planning Application Boundary
- Land Under the Control of the Applicant
- Existing Buildings & Infrastructure within and surrounding the Site
- Proposed Additional Plant, Tanks & Infrastructure



PROJECT
Imperial Wharf

DRAWING TITLE
Proposed Development

DATE
November 2021

SCALE
1:1,250 @ A3

DRAWING No.
KD.IMP.D.004

DRAWING STATUS
FINAL

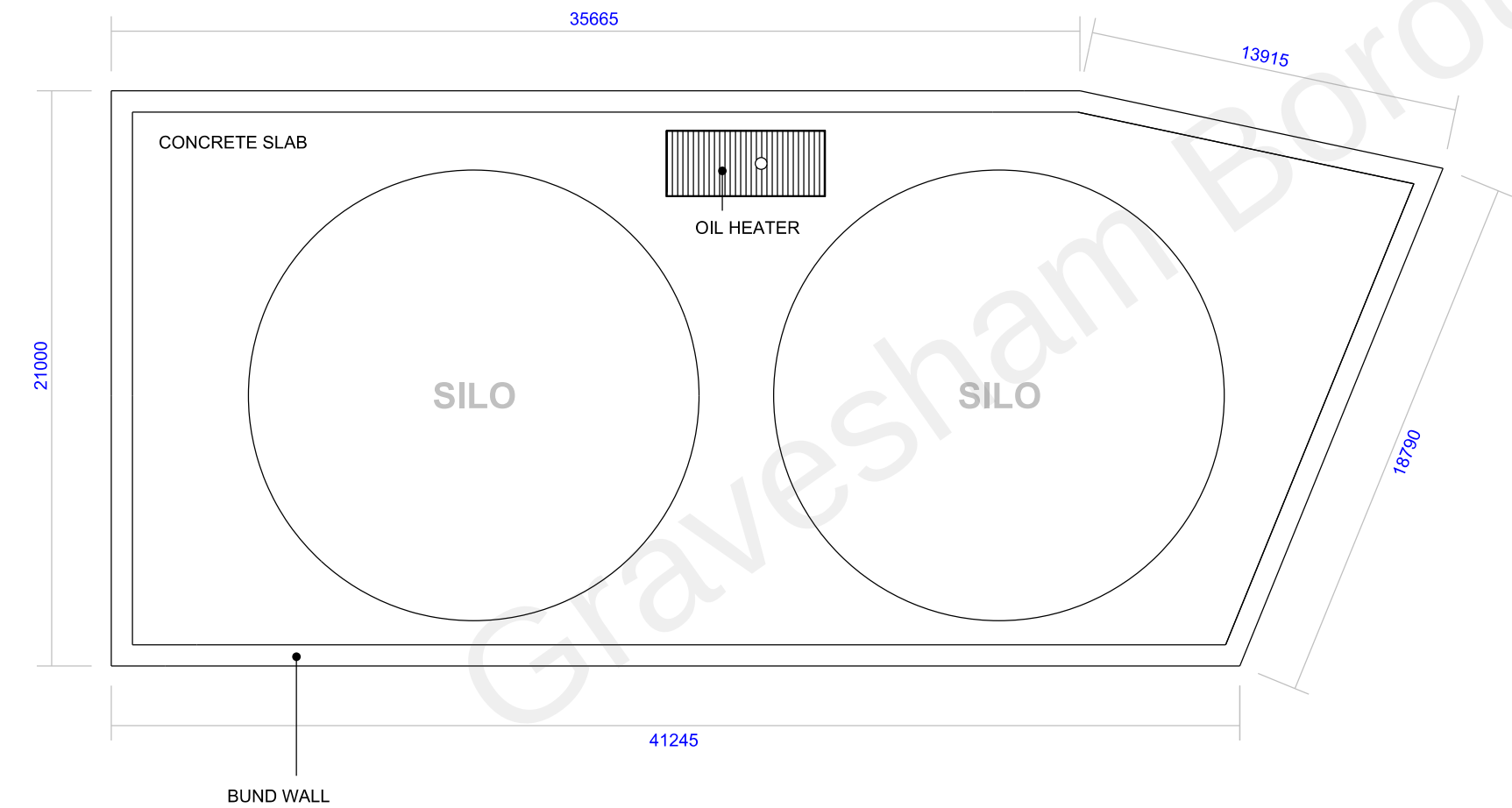
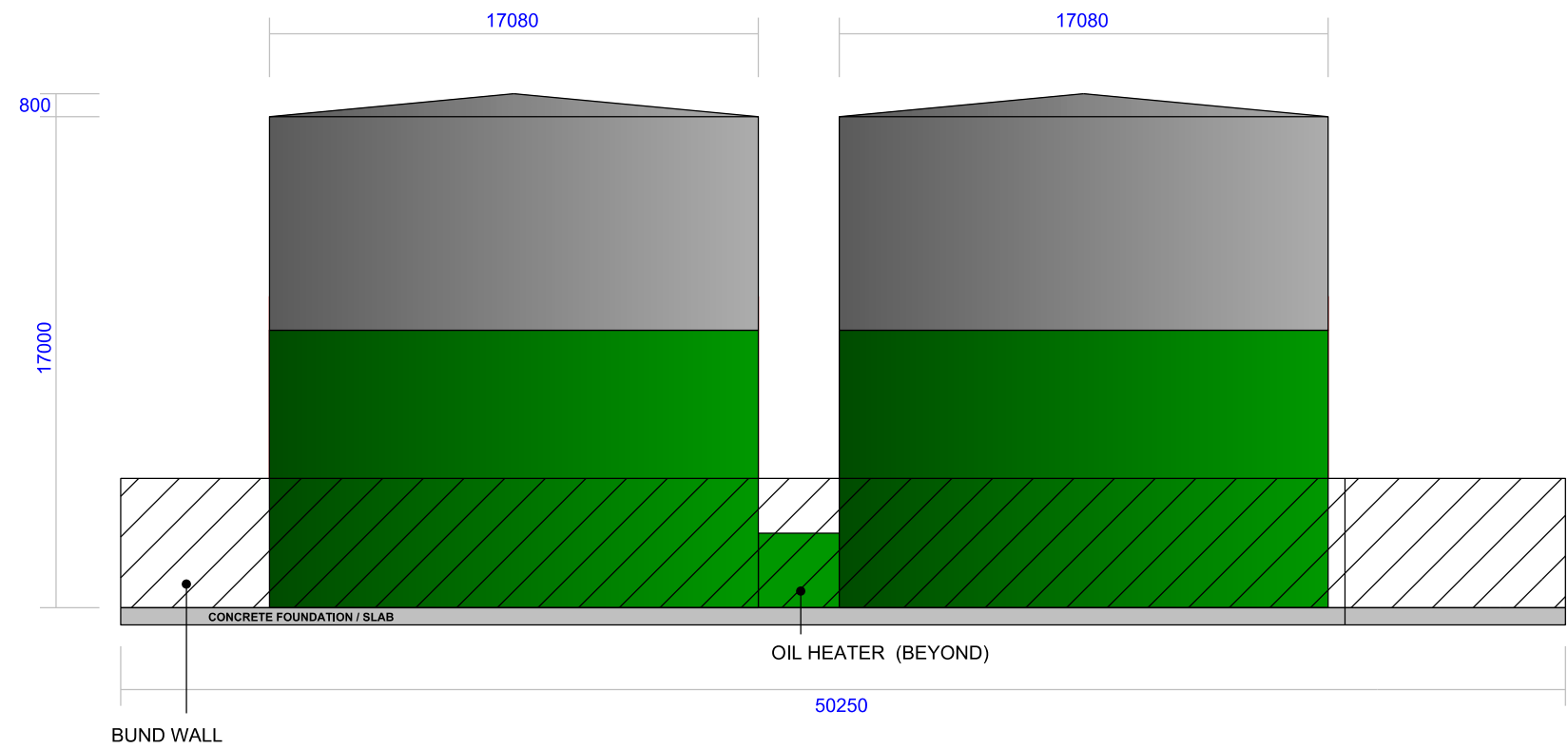


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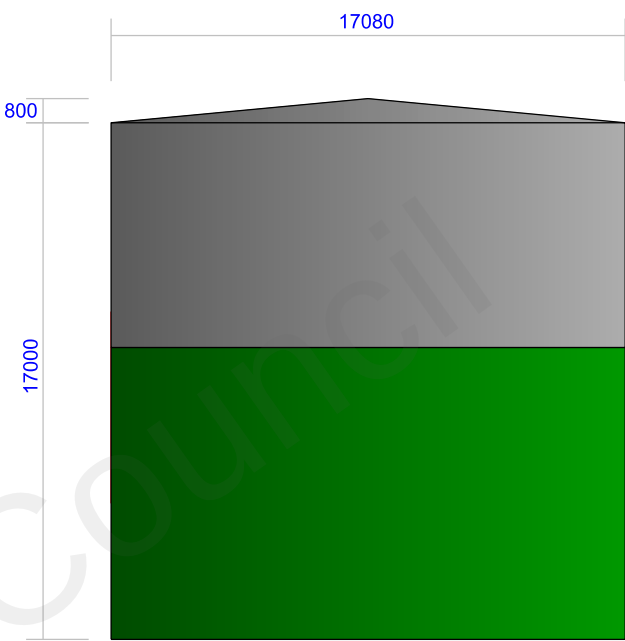
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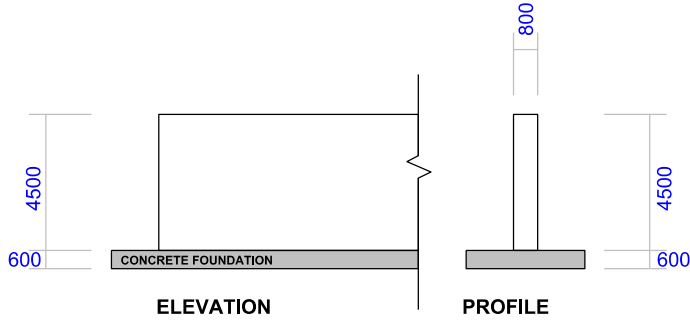
ELEVATION A: 2No. Proposed Silos, Bund Wall & Oil Heater



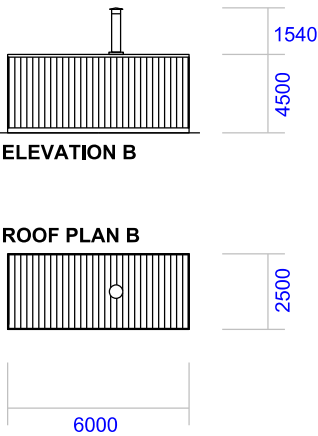
ROOF PLAN A: 2No. Proposed Silos, Bund Wall & Oil Heater



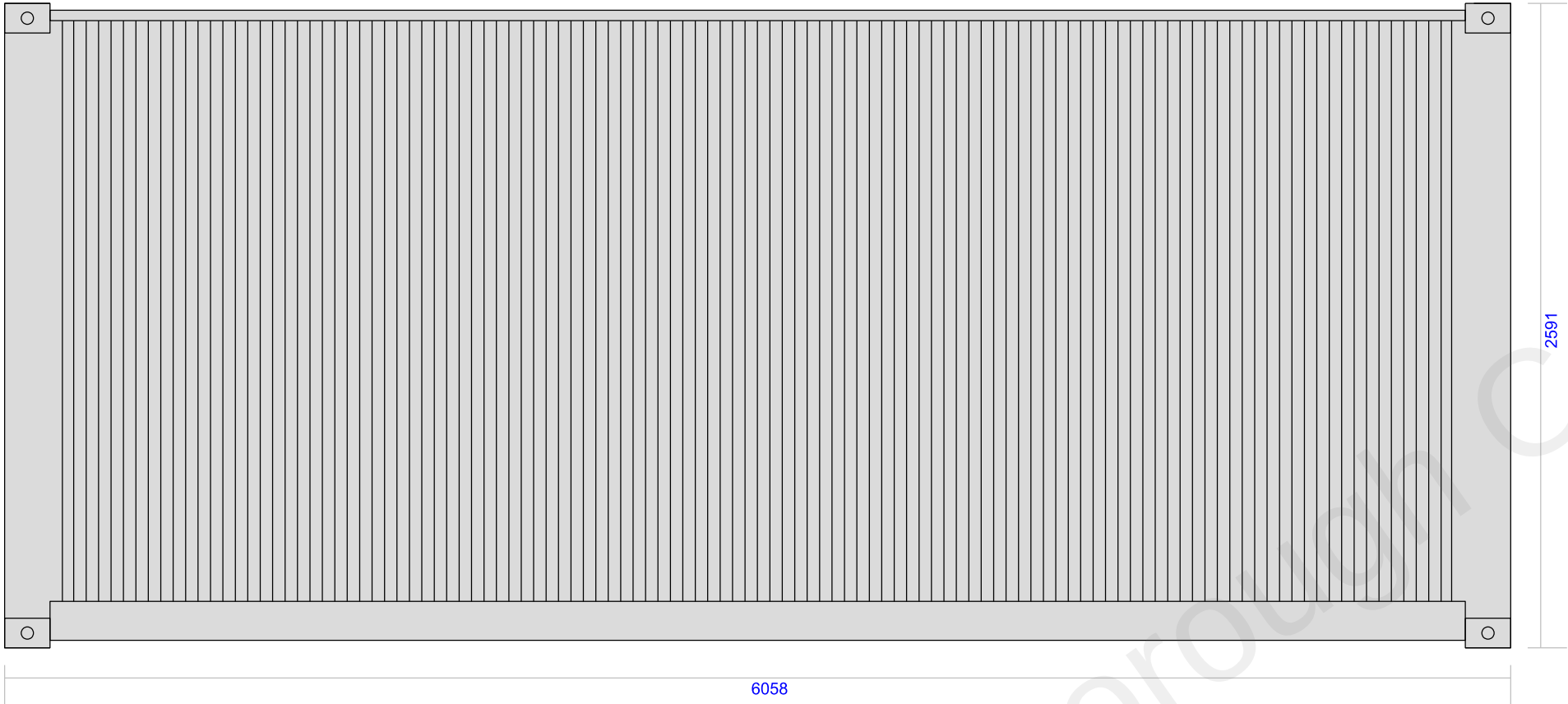
ELEVATION C: Proposed Bund Wall



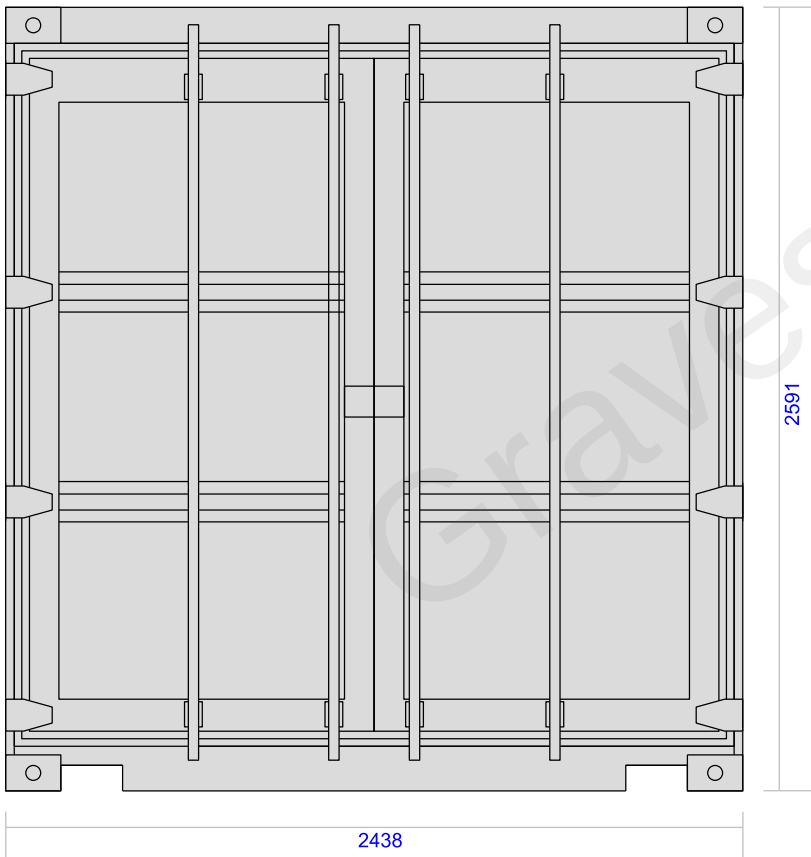
ELEVATION & ROOF PLAN B: Proposed Oil Heater



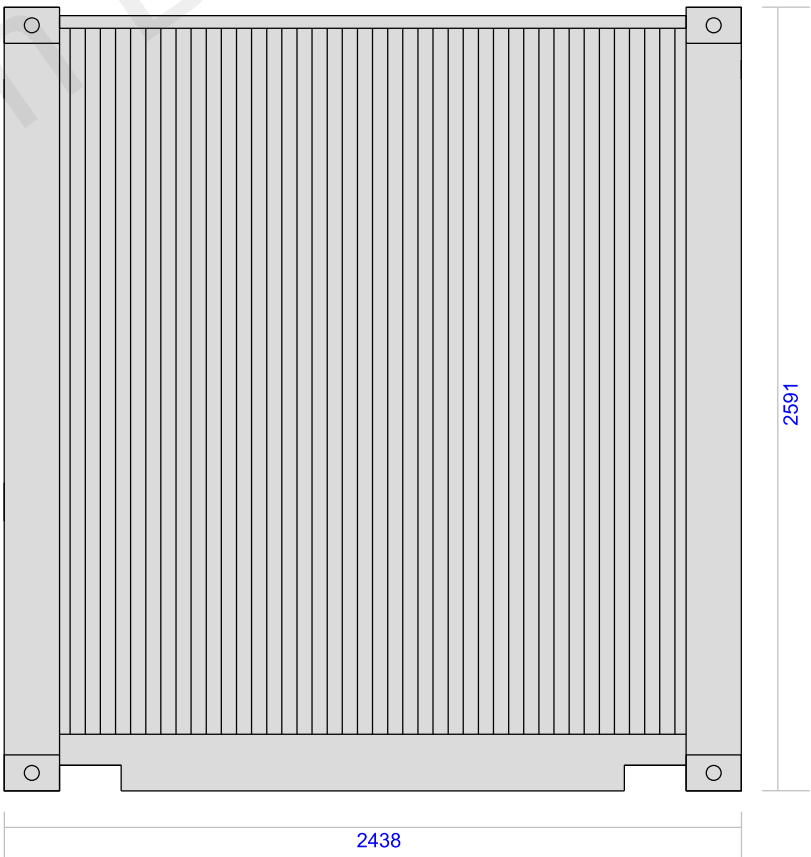
SIDE ELEVATON



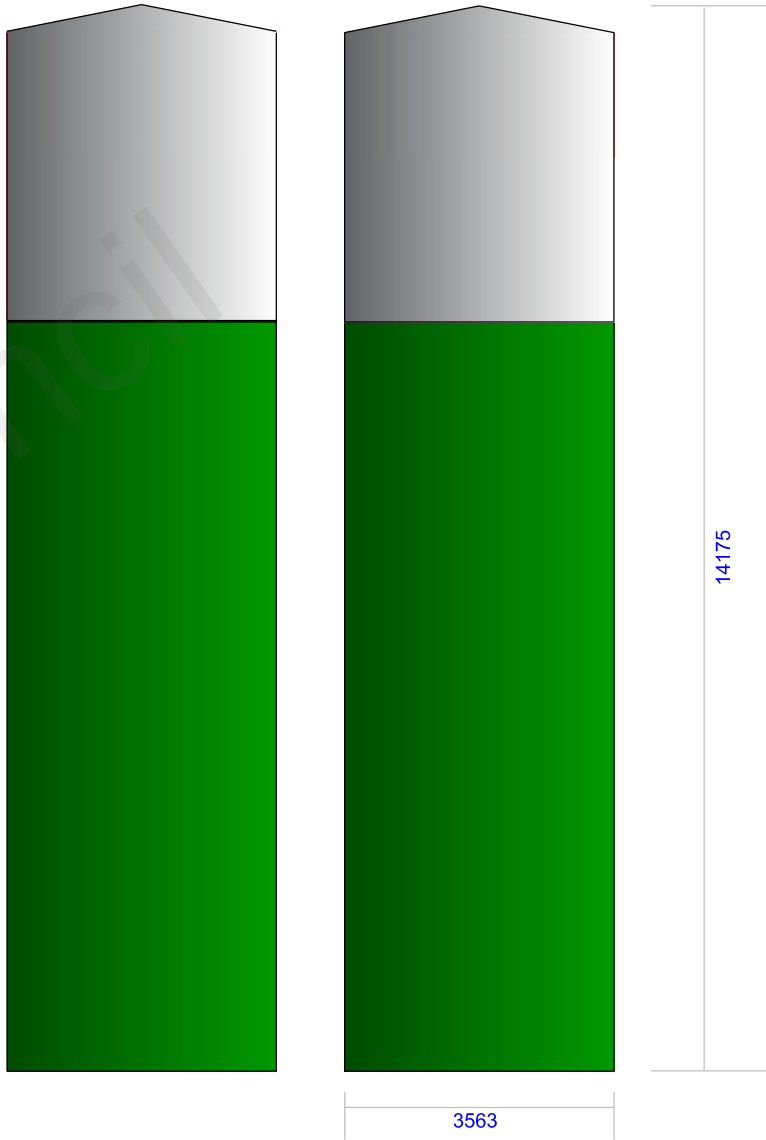
FRONT ELEVATION



REAR ELEVATION

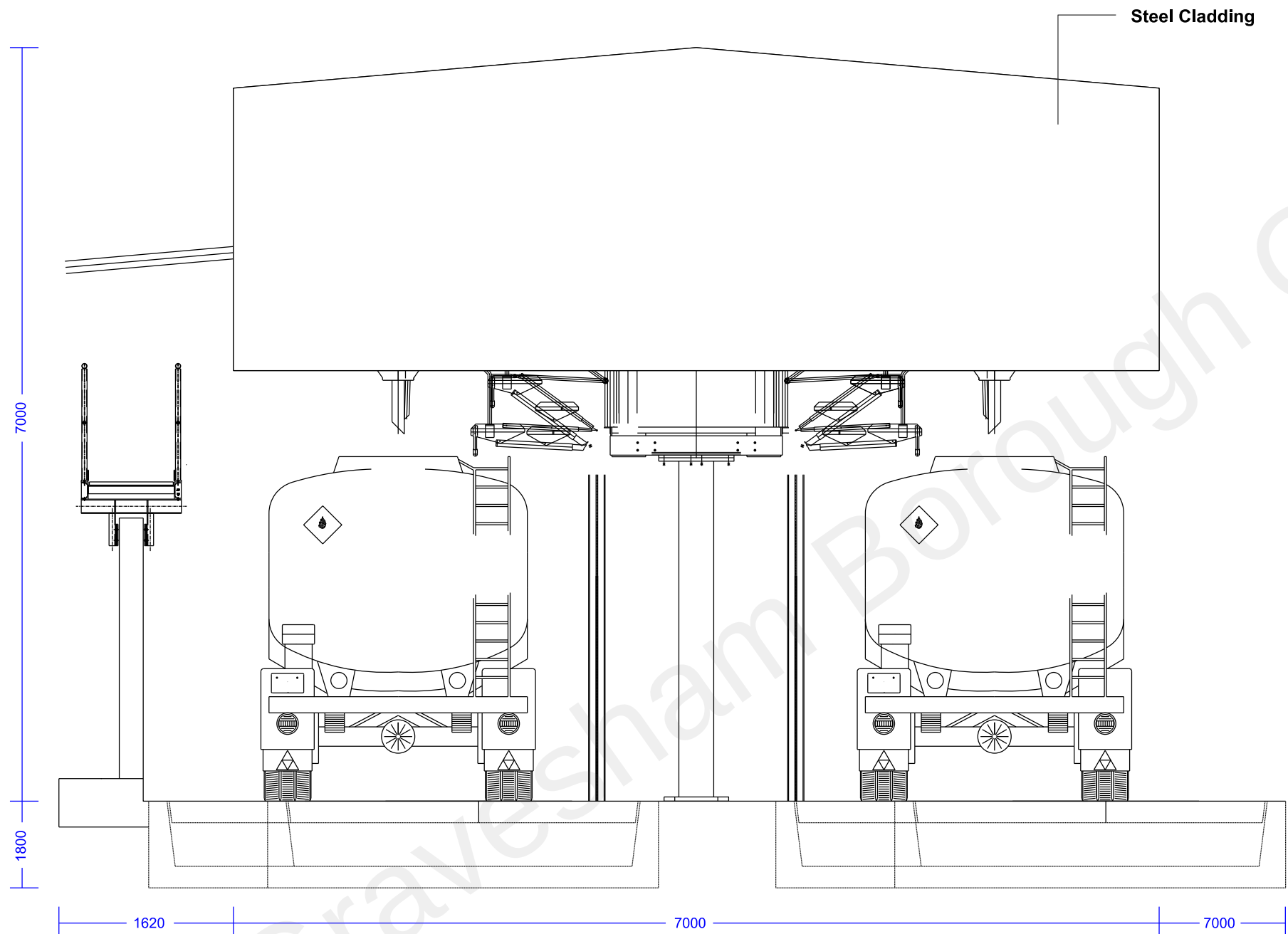


TYPICAL 20' SHIPPING CONTAINER - HOUSING EMULSION PLANT (1:25 @A3)



EMULSION TANKS ELEVATIONS (1:100 @A3)





ELEVATION - TRUCK LOADING SYSTEM

