



Application: 20240689
KCC Reference: KCC/GR/0102/2024

TOWN AND COUNTRY PLANNING ACTS

TOWN AND COUNTRY PLANNING GENERAL REGULATIONS 1992

NO OBJECTION TO GRANT OF PERMISSION TO DEVELOP

To: **Kent County Council**
First Floor, Invicta House
County Hall
Maidstone

TAKE NOTICE that the **GRAVESHAM BOROUGH COUNCIL**, the Local Planning Authority under the Town and Country Planning Acts, has **NO OBJECTION** for development of land situate

at **Tarmac Northfleet Works**
The Shore
Northfleet
Gravesend
Kent

and being **KCC Consultation - The erection of a silo for storage of pulverised fuel ash (PVA) including outload tower, vehicular access, and drainage infrastructure.**

Referred to in your application dated 24 July 2024.

GRAVESHAM BOROUGH COUNCIL HOWEVER MAKES THE FOLLOWING COMMENTS :-

1 The following comments have been provided by GBC's Environmental Protection team:

Air Quality

The site falls within the former Northfleet Air Quality Management Area (AQMA) declared for exceedances of PM10. Although this AQMA has now been revoked, it is still important to ensure that any development within the area does not result in additional exceedances of the air quality objectives which may result in a new declaration. The submitted Air Quality Assessment (AQA) has been reviewed. The AQA looks at both construction phase impacts and also operational phase impacts. Odour is also considered in the assessment. Impacts are considered to be not significant during construction and operational phases. Odour is also unlikely.

Looking at the process, the PFA comes via enclosed pipeline from the wharf to the silo. The silo itself is fully enclosed and the outload area where lorries are loaded for onward movement of material is also covered/enclosed apart from the areas where the lorries enter and exist. Areas where dust/material can be emitted are few - a small amount is possible during the coupling/uncoupling of the pipe when the silo is filled and possible via the loading sock filling the lorries. Good management practices and housekeeping will minimise any issues.

The process will also be covered by a variation to the existing Environmental Permit for the plant/site and this will also contain conditions aimed at minimising any fugitive dust emissions.

Based on this, there are no concerns from an air quality perspective.

Noise

A Noise Assessment has been undertaken by WBM Acoustic Consultants and has taken into consideration the existing 24-hour operation of the site and the impact on the nearest residential (existing and proposed). Background noise measurements and measurements in the existing

cement store during loading (which is the main noise source) were taken and used in the BS4142 assessment which has taken a worst-case approach in terms of added acoustic feature adjustments.

During the day, the noise from the plant and also lorry movements is not significant and is generally at or below the background noise levels in the area. Any noise is unlikely to have an adverse impact.

At night however, the noise levels are likely to be 5dB above the existing background noise levels so there will potentially be an impact (in Lawn Road, Factory Road and the proposed residential at Harbour Village). In this respect, noise mitigation will therefore be needed. Due to topography, screening or an acoustic barrier was ruled out as impracticable. The report proposes limiting the night-time operations to only use one lane for loading rather than the 2 lanes as usually occurs. Although this does reduce the overall impact, the noise levels are still predicted to be in excess of the background noise levels (by c. +2-3dB).

Our usual criteria for new noise sources in an area is that it will be at least 10dB below the existing LA90 background level at the nearest noise sensitive receptors (i.e. dwellings) when measured and assessed in accordance with BS4142:2014. It is accepted that this is an established industrial area and that some noise is to be expected/experienced. Although the proposal does not achieve our criteria during the day, due to the nature of the area and the fact that the noise is predicted to be at or below background, this is acceptable. However, at night-time, even with the proposed mitigation, the noise levels are in excess of the background, and this is not acceptable.

Therefore, additional mitigation measures need to be reviewed in order to further reduce the noise levels from the proposed plant and operations. Ideally, this should be reviewed and agreed prior to any decision being made. However, as GBC are not the authority determining this application, that may not be possible. Therefore, the following condition is recommended:

Noise - Mitigation

The rating noise from plant/equipment and noise associated with the development shall be at least 10dB below the existing LA90 background level during the night time period of 2300 to 0700 at the nearest noise sensitive receptors (i.e. dwellings) when measured and assessed in accordance with BS4142:2014. Details of how noise from the proposal shall be attenuated/mitigated must be submitted to and approved in writing by the local planning authority prior to the use commencing. The use hereby permitted shall not take place other than in accordance with these approved details.

Contaminated Land

GES Ltd have undertaken an intrusive Geo-Environmental Ground Investigation on the proposed development site. Made ground was found across the areas ranging from 4.3m to 4.6m. A geotextile layer was found in part of the site with sandy gravel both above and below. In terms of contaminants the criteria for commercial end use was used. There were no exceedances of any contaminants. No asbestos was found in any of the soil samples analysed. A conceptual site model is included and overall, the assessed risk is LOW. Based on this, no further investigation or any remediation works is required.

It is recommended that the following condition is attached to deal with any contamination found during the groundworks that has not been found previously:

Contaminated Land - Watching Brief

The applicant shall undertake a watching brief during construction in case any contamination issue is encountered. If during development any contamination is found, the local planning authority should be informed as soon as practical, and the work shall not continue until written agreement is provided by the local planning authority as to the appropriate measures to be taken to resolve the matter and they are satisfied that those measures have been carried out.

Construction Environmental Management Plan

A condition to address this should be included in order to minimise any impact during the development.

Recommendation

The above Environmental Protection comments and recommendations should be considered as part of the assessment of the application.

Dated this 4th day of September 2024

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