

The Hurlstone Partnership

PROPOSED INSTALLATION OF TWO ADDITIONAL BITUMEN TANKS, LOAD
OUT GANTRY, THE INSTALLATION OF A BITUMEN EMULSION PLANT AND
ALTERNATIVE CAR PARKING AT IMPERIAL WHARF, GRAVESEND, KENT,
DA11 0DY

Transport Statement

June 2022

JPH/140603/Final

The Hurlstone Partnership

PROPOSED INSTALLATION OF TWO ADDITIONAL BITUMEN TANKS, LOAD OUT GANTRY, THE INSTALLATION OF A BITUMEN EMULSION PLANT AND ALTERNATIVE CAR PARKING AT IMPERIAL WHARF, GRAVESEND, KENT, DA11 0DY

Document Status – Final

Produced by: ----- J P Hurlstone

Date: June 2022

Transportation Planning, Highway Design and Environmental Assessment

The Hurlstone Partnership

CONTENTS

1	INTRODUCTION.....	1
2	EXISTING SITUATION.....	2
3	EXISTING TRAFFIC.....	4
4	HIGHWAY SAFETY	5
5	PROPOSED DEVELOPMENT	5
6	TRAVEL PLAN	6
7	DEVELOPMENT TRAFFIC & IMPACT	7
8	SUMMARY	8

FIGURES

Proposed Development (PDE Consulting – Reduced Scale)

APPENDICES

A FM Conway – Imperial Wharf – Gravesend Travel Considerations

The Hurlstone Partnership

1 INTRODUCTION

- 1.1 FM Conway Limited (the Applicant) is seeking planning 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 (the Proposed Development).
- 1.2 The Applicant currently runs a bitumen storage facility at the Site, which is situated on the south bank of the River Thames, approximately 0.9 kilometres to the northwest of the centre of Gravesend. The Site sits adjacent to industrial and retail development, located to the south, east and west, with the River Thames to the north.
- 1.3 Bitumen is imported to the site via the River Thames and the on-site jetty. Bitumen is stored within the existing tanks, which have a cumulative capacity of 7,360 tonnes, prior to distribution via road in HGV tankers. The Site also contains offices within The White House, some of which are let to other businesses, and an adjacent but detached Technology Laboratory building.
- 1.4 The Site has a long planning history since its earlier use as part of the Imperial Paper Mills complex until the early 1980's. More recently, the site became a bitumen terminal in 2014, with a Polymer Modified Bitumen (PMB) Plant added 2017 and the approval for 4 No. additional storage tanks in 2018.
- 1.5 The current proposal seeks to add 2 No. additional bitumen tanks to deliver a further 6,000 tonnes of storage capacity, in order to provide resilience to the supply of bitumen to various asphalt plants within a 50 mile radius of the Site. The new tanks would be located on an existing car park to the south of the existing terminal and serviced via an underground pipe connecting to the existing facility.
- 1.6 In addition, a bitumen emulsion plant is to be constructed on land to the east of the existing Technology Laboratory, which would allow the bitumen to be processed to form an emulsion to help the bonding of materials when undertaking road repairs.
- 1.7 A new 'Load Out Gantry' is also proposed to the west of The White House office block, which would be used to load HGVs with bitumen products for onward distribution and would supplement the existing loading facilities located within the eastern part of the wider Imperial Wharf Site.
- 1.8 The land to the west of the load out gantry would continue to provide HGV parking, together with other HGV parking areas within the site, such as the land to the west of the new storage containers to the south.

The Hurlstone Partnership

- 1.9 The car parking which would be displaced by the new storage containers is to be partially replaced on land to the west of Clifton Marine Parade and would be accessed via West Mill. The proposed car parking provision for both HGVs and cars has been assessed based on the operational requirements of the Applicant.
- 1.10 The proposed site layout is illustrated in the PDE drawing no. KD.IMP.D.004, which is provided in the figures section at the back of this report.
- 1.11 The Hurlstone Partnership Limited was instructed to prepare a Transport Assessment in response to the Scoping Opinion provided by the Local Authority, which confirmed an Environmental Assessment is not necessary. However, having reviewed the highway responses and considered the potential traffic impacts associated with the proposed development, it was concluded a Transport Statement should be sufficient to allow the effects of the development on the local infrastructure to be assessed.
- 1.12 The remainder of this report details the findings of the review undertaken and confirms that the transport impact would not be significant and therefore planning permission should not be prevented or refused on highways grounds.

2 EXISTING SITUATION

- 2.1 Other than parking areas, the existing Bitumen Terminal / Plant sits on the north side of Clifton Marine Parade and immediately to the south of the River Thames. Clifton Marine Parade starts at a roundabout with Thames Way and the access to an ASDA store, approximately 215m to the south, then runs in a generally northerly direction before turning right from the priority, route via a T junction, to continue east as the minor arm cul-de-sac serving the Site and the service yard to units within the Imperial Retail Park, which lies to the south.
- 2.2 For motor vehicles, this circa 200m long cul-de-sac section of Clifton Marine Parade terminates at a turning head. However, it also forms part of Sustrans National Cycle Route 1, which continues east along the south side of the River Thames as part of the 1264 mile route from Dover, Kent, to Knockbreck in Scotland. Gravesend Rail Station is located approximately 1 km from the site via the route to the east along NCN1 then local roads.
- 2.3 Access to the western HGV parking area of the Site is provided approximately 20m from the junction on the north side. An additional HGV parking area is accessed approximately 25m along the route from the junction on the south side, with the private car park access a further 40m distant, again on the south side. The access to the car park has a barrier restricting vehicle height to 7 feet / 2.1m. The existing car park provides 45 spaces. However, it was apparent that the demand remains significantly below that level based on the observed 10 vehicles parked during the site visit.

The Hurlstone Partnership

- 2.4 Approximately 120m along the cul-de-sac on the north side there is an egress from the HGV loading area, which operates on a one-way basis and is accessed from the east end of the site at the end of the cul-de-sac.
- 2.5 The width of this section of Clifton Marine Parade varies in width between approximately 6.1m and 7.3m along its length. Double yellow lines are provided on both sides along much of its length to prevent on-street parking, with the exception of a 'Loading Only' bay outside The White House offices.
- 2.6 A pedestrian footway runs along the south side of the route only until reaching the HGV access at the western end of the site. Immediately to the west of the access, a footway is introduced on the north side, which runs westwards to follow The Shore on its north side.
- 2.7 On the approach to the junction with the priority route section of Clifton Marine Parade, which continues through a bend to head west as The Shore, the minor arm widens to provide separate traffic lanes for vehicles turning left and right onto Clifton Marine Parade and The Shore respectively. A central island is also provided on the minor arm, which segregates inbound and outbound traffic movements at the junction. Whilst also incorporating dropped kerbs to assist pedestrian crossing movements.
- 2.8 Due to its position on the outside of a bend, visibility for drivers is excellent to the left and right.
- 2.9 At the time of the site visit, ongoing residential development had prevented any HGV access to the wider highway network via The Shore and Crete Hall Road. Based upon the characteristics of the development and its surfacing within Crete Hall Road, it appeared unlikely that through-movement for HGVs is likely to be reinstated. However, pedestrian and cycle access is retained to the west, as confirmed by signage to Ebbsfleet (3 miles) and Dartford (8 miles) via NCN 1 to the west of Lansdowne Square. This route provides access to the bus services on London Road, which are around 0.6km from the Site.
- 2.10 Turning right from the Clifton Marine Parade cul-de-sac to continue south towards the Thames Way / Asda roundabout, the continuation of Clifton Marine Parade has a width of between approximately 7.3m and 9m where localised widening had been provided to facilitate a right turn lane into East Mill, which lies approximately 95m to the south and provides access to the Imperial Business Estate.
- 2.11 Along the east side of Clifton Marine Parade, on-street parking is permitted within marked bays along most of its length, with double yellow lines between them. Double yellow lines also prevent parking along the west side of the route, to allow two-way vehicle movement to be maintained when the parking bays are occupied. Pedestrian footways are provided along both sides of the route, which has street-lighting.
- 2.12 West Mill is located on the west side of Clifton Marine Parade, approximately 45m to the south of East Mill on the opposite side of the road. West Mill is also a cul-de-sac in a T

The Hurlstone Partnership

format. Between Clifton Marine Parade and the priority junction at the head of the T, approximately 70m distant, the route is 7.3m wide. The route then continues south and north from the junction for approximately 120m and 150m respectively. The visibility at both junctions on West Mill is good. The proposed relocated parking area is located towards the northern end of West Mill.

2.13 HGV traffic leaving the site heads southwest along Thames Way to a signal-controlled junction with the A226 Thames Way, approximately 325m distant, at which point the 30 mph speed limit increases to 40 mph. Signage at the junction confirms the section to the northeast of the signals is the signed HGV route to Imperial Business Estate.

2.14 When travelling from the Site, vehicles turn left at the signals and continue southwest along the A226 Thames Way, which provides the main access to the Gravesend area from the southwest.

2.15 The A226 is a high-standard single carriageway with an overall width of approximately 14m, which includes the bus routes running along each side, leaving 7.3m for normal traffic. A shared pedestrian/cycle route is provided along the northwest side of the carriageway.

3 EXISTING TRAFFIC

3.1 The existing facility receives approximately two deliveries of bitumen per month from shipping tankers arriving at the facility from Continental Europe in cargoes of up to 4,000 tonnes. Unloading typically takes around 9-15 hours.

3.2 Bitumen is pumped into heated and insulated storage by the ship's on-board pumps. The bitumen is then discharged into HGVs before leaving 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.

3.3 Based upon the existing levels of trading, there are typically around 15 to 20 loads out per day (i.e. 30 to 40 HGV movements in total). However, this activity can vary. Information from the plant provided by the Applicant confirms activity has varied between 1 and 29 loads per day. These movements are spread across the 24 operating hours per day permitted at the Site.

3.4 In addition to the HGV traffic, there are movements associated with staff employed on site by the Applicant (26 people) and also people travelling to and from the serviced offices let within The White House (15 people).

3.5 Traffic surveys undertaken in 2015 for the assessment of the additional, approved 4 No storage tanks at the Site revealed that non-HGV traffic movements along the cul-de-sac Clifton Marine Parade averaged approximately 90 movements per day.

The Hurlstone Partnership

- 3.6 In terms of HGV traffic, the 24 hour turning count undertaken on Wednesday 06th September 2015 revealed the two-way combined total HGV movements on Clifton Marine Parade to the south of the junction with the cul-de-sac varied between 0 (00:00 – 01:00) and 13 (08:00 – 09:00 and 13:00 – 14:00) per hour, with a total of 126 movements over the 24 hour period.

4 HIGHWAY SAFETY

- 4.1 A review of Crashmap reveals there have been no recorded personal injury accidents recorded along Clifton Marine Parade or Thames Way up to the A228 signals involving goods vehicles within the most recent 5 year period (2017 – 2021) for which data is available.
- 4.2 A single slight injury accident was recorded on Thames Way approximately 125m from the signal-controlled junction in November 2017, involving a moped and a car.
- 4.3 In the event there is a feature of the local road network that compromises safety, it is normal to find a number of incidents at a location, which share common characteristics. The absence of such accident clusters in this case suggest there are no features of the local road network that inherently compromise safety for its users.

5 PROPOSED DEVELOPMENT

- 5.1 The proposed development comprises four main aspects: the two additional bitumen storage tanks providing an additional cumulative capacity of 6,000 tonnes; the load out gantry; the emulsion plant; and the provision of alternative car parking.
- 5.2 The purpose of the proposed development is 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.
- 5.3 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, which are located at Eastham in Ellesmere Port and Lindsay in Humberside. The remainder of the UK demand for bitumen is satisfied by importation from mainland Europe. However there have also been significant numbers of European refinery closures from 2009-2015, resulting in a less reliable supply of bitumen to the UK, which has been exacerbated by the current global climate, with supply chains struggling to keep up with demand post-Covid and as a result of Russia's war on Ukraine, leading to widespread delays in the supply of goods and products, and significantly increased costs.

The Hurlstone Partnership

- 5.4 In terms of HGV activity, 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 via the established access points. However, as a result of the new Load Out Gantry, some of the HGVs that are parked in that area would be loaded before leaving, rather than leaving via the existing loading facility at the eastern end of the Site.
- 5.5 Similarly, there are no proposals to increase the frequency of deliveries of bitumen to the site via the existing jetty, although the increased storage would allow larger deliveries on each occasion.
- 5.6 The car parking within the Site is to be relocated and rationalised. The existing offices within The White House are to be used only by the Applicant and will therefore result in reduced occupancy and travel. This will result in a corresponding reduction in car parking spaces within the site. The proposed layout identifies a provision of 32 spaces on the replacement car park off West Mill, plus 4 spaces (3 of which are for disabled use) in the area to the west of The White House on the north side of Clifton Marine Parade, where 3 motorcycle and 5 cycle parking spaces are also provided, in accordance with the Local standards and floor areas within the Site.
- 5.7 The total staff provision at Imperial Wharf includes:
- 4 Directly employed in Terminal Operations
 - 8 HGV Tanker Drivers
 - 10 Laboratory
 - 4 Ancillary
 - 26 Total Staff
- 5.8 Therefore, even if every member of staff travelled independently by car, it is apparent that the proposed parking provision includes a significant margin for unforeseen circumstances.
- 6 TRAVEL PLAN
- 6.1 The Applicant currently operates an effective Travel Plan within the company and has committed to reducing the impacts of staff travel within the Travel Considerations document provided at Appendix A for information. The company has set targets for all office-based staff to be using zero emission travel (bike, electric car, public transport or walking) by 2025 and is to implement a cycle to work scheme during 2022.
- 6.2 The company will also provide 30% of its parking capacity with electric chargers and all company cars are to be electric from 2025, whilst also encouraging working from home 1 day per week for relevant staff.
- 6.3 Travel surveys have already been carried out during 2021 for the site operatives, but at the time many office staff were based at home due to Covid 19 guidance.

The Hurlstone Partnership

- 6.4 The Applicant has committed to annual travel surveys for all staff and appropriate monitoring and strategy to achieve identified targets.

7 DEVELOPMENT TRAFFIC & IMPACT

- 7.1 In terms of HGV traffic, the Applicant has advised that the increased on-site storage could result in additional HGV activity distributing bitumen and emulsion to its clients. The additional activities would account for an average of 5 additional loads / 10 HGV movements on the local road network per day.
- 7.2 The emulsion plant will require specialised products to be delivered and is predicted to attract 1 or 2 deliveries of additives per week, by road in HGVs, resulting in 2 HGV movements on some days, but not every day, which are included in the overall increase identified above.
- 7.3 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.
- 7.4 This is apparent when considering the recorded traffic movements at the plant (1 – 29 loads / 2 – 58 movements per day) and also the observed HGV activity on Clifton Marine Parade (0 – 13 HGV movements per hour). It is clear that an additional 5 loads / 10 movements per day fall well within the normal range of day to day and hour to hour variations on the local road network.
- 7.5 Consideration should also be given to the reduction in staff movements associated with The White House, which currently hosts 15 people within the serviced, let office space that is to be brought back in-house for use by the Applicant as part of the proposed development at the Site. This reduction in traffic would offset the increase in HGV activity arising from the proposed development.
- 7.6 The variations in traffic activity arising from the proposed development were recognised to be “...*relatively insignificant given the capacity of the local highway network...*” by Kent Highways and Transportation in its response to the Screening and Scoping Request, which requested a Transport Assessment be prepared.
- 7.7 The assessment undertaken revealed that the proposed development is served by a suitable and safe access and that the Site is accessible by a choice of travel modes, with National Cycle Route 1 passing directly adjacent and providing access to local bus and rail services.
- 7.8 A review of traffic survey data revealed that whilst the proposed development would result in an increase in HGV traffic, this would not only be offset by a reduction in movements associated with let offices, which are to be used instead by the Applicant in association with their on-site activities, but in any event the additional HGV movements fall well within the

The Hurlstone Partnership

existing range of day to day and hour to hour variations currently experienced and accommodated on the local road network.

- 7.9 When considered in this context, it is concluded that the proposed development would not result in an unacceptable impact on highway safety or result in a severe residual cumulative impact on the road network. Therefore, in accordance with the guidance in the National Planning Policy Framework paragraph 111, planning permission should not be prevented or refused on highways grounds.

8 SUMMARY

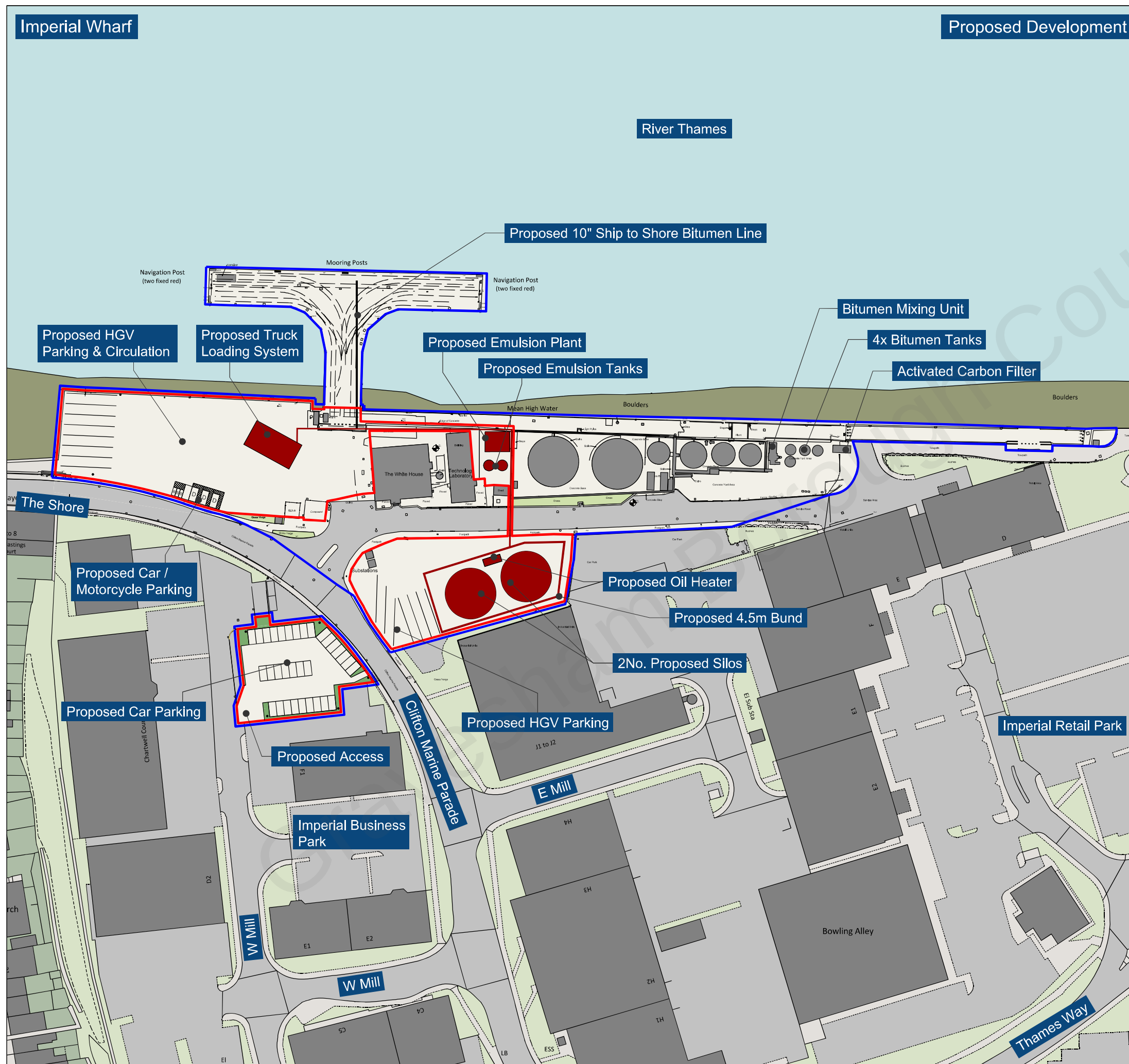
- 8.1 FM Conway Limited seeks planning permission at the existing bitumen facility for the installation of two additional bitumen tanks, a load out gantry, the installation of a bitumen emulsion plant and alternative car parking on land at Imperial Wharf, Clifton Marine Parade, which is situated on the south bank of the River Thames, approximately 0.9 kilometres to the northwest of the centre of Gravesend, on the south bank of the River Thames.
- 8.2 Bitumen is imported to the site via the River Thames and the on-site jetty, where it is pumped into storage containers for subsequent distribution by road to asphalt plants within a 50 mile radius.
- 8.3 The Site has a long planning history since its earlier use as part of the Imperial Paper Mills complex until the early 1980's. More recently, the site became a bitumen terminal in 2014, with a Polymer Modified Bitumen (PMB) Plant added 2017 and the approval for 4 No. additional storage tanks in 2018.
- 8.4 The current proposal seeks to add 2 No. additional bitumen tanks to deliver a further 6,000 tonnes of storage capacity in addition to the 7,360 tonnes currently available, in order to provide resilience to the supply of bitumen to various asphalt plants. The new tanks would be located on an existing car park to the south of the existing terminal and serviced via an underground pipe connecting to the existing facility.
- 8.5 In addition, an emulsion plant is to be constructed on land to the east of the existing Technology Laboratory, to help the bonding of materials when undertaking road repairs.
- 8.6 A new 'Load Out Gantry' is also proposed, which would be used to load HGVs with bitumen products for onward distribution and would supplement the existing loading facilities.
- 8.7 HGV parking on-site would be retained and replacement car parking to meet the requirements of the Site in accordance with local standards would also be provided.
- 8.8 The Hurlstone Partnership Limited was instructed to review the highway impact of the proposed development, in response to a request from the Local Authorities.

The Hurlstone Partnership

- 8.9 The review revealed that the proposed development would result in an additional 10 HGV movements (5 in / 5 out) per day on the local road network when compared with the current activities at the Site.
- 8.10 However, this increase would be offset by a reduction in trips due to the vacation of The White House offices by tenants, as the offices are to be used by the Applicant in association with the on-site activities.
- 8.11 Notwithstanding this, a review of recorded traffic data revealed the proposed increase in HGV activity falls well within the range of normal day to day and hour to hour variations on the local road network, which has an excellent safety record.
- 8.12 The Site was found to be accessible by a choice of travel modes and sits adjacent to Route 1 of the National Cycle Network, which provides connectivity to local bus and rail services. Sustainable travel is also supported by the Applicant, which runs a Travel Plan process within the Company with identified targets, monitoring and review.
- 8.13 Having considered the findings of the review, it was concluded that when compared with the tests imposed by national policy, planning permission should not be prevented or refused on highways grounds.

The Hurlstone Partnership

FIGURES



Legend

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

pde. consulting
limited
chartered surveyors

PROJECT
Imperial Wharf

DRAWING TITLE
Proposed Development

DATE
May 2022

SCALE
1:1,250 @ A3

DRAWING No.
KD.IMP.D.004

DRAWING STATUS
FINAL



Reproduced from Ordnance Survey digital map data © Crown Copyright. All rights reserved. License number 0100031673

THIS DRAWING MAY NOT BE USED
WITHOUT CONSENT OF PDE
CONSULTING LTD

01284 764085 . www.pdeconsulting.co.uk

FM Conway - Imperial Wharf – Gravesend Travel Considerations

Imperial Wharf – Gravesend Travel Considerations

Introduction

FMC Conway have a facility at Imperial Wharf, Gravesend which imports bitumen by sea utilising the River Thames and stores, processes and exports end use bitumen into HGV tankers for onward distribution by road. The facility is a strategically important facility for the importation and onward distribution of bitumen for use in Asphalt manufacturing across the South of England and Wales.

Travel Surveys

Travel surveys were carried out in 2021 for the site operatives. Many of the office based staff were still observing the stay at home guidance issued by the UK Government in response to the COVID-19 pandemic.

Targets:

- All office-based staff should be using zero emission travel (bike, electric car, public transport or walking) by end of 2025
- Provide cycle to work scheme by 2022

Package of measures:

- Provide covered cycle racks at Imperial Wharf
- Provide 30% of parking capacity with electric chargers
- All company cars to be only electric from 2025
- Working from home encouraged 1 day per week for relevant staff.

Monitoring:

- An annual travel survey will be sent out to all staff
- Targets will be added to the Environmental Action Plan Tracker and will be reported on as part of the end of year report.

Action Plan

Working closely with our HR and marketing teams we will roll out flexible working options for our staff which is reiterated in “Business updates”

Our “Rewarding Great People” benefits platform will be the host for cycle to work schemes.

Our Fleet division will source and supply electric company cars in line with our policy.