



PLANNING APPLICATION SUPPORTING STATEMENT

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**

Application prepared on behalf of:
F M Conway Limited

Application date:
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This submission was prepared by PDE Consulting Limited on behalf
of F M Conway Limited

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Drawing Number KD.IMP.D.010	Emulsion Plant & Tanks	Scale varies @A3
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APPENDICES

Appendix 1	Screening Opinion issued by Gravesham Borough Council dated 20 December 2021
Appendix 2	Landscape and Visual Impact Assessment produced by Kedd Limited
Appendix 3	Transport Statement produced by The Hurlstone Partnership
Appendix 4	Flood Risk Assessment produced by BCL Hydro & Surface Water Drainage Strategy produced by Ambiental
Appendix 5	Ground Condition Desktop Study produced by Ground Condition Consultants Limited
Appendix 6	Preliminary Ecological Appraisal produced by Wilkinson Associates
Appendix 7	Cultural Heritage Assessment produced by Andrew Josephs Associates
Appendix 8	Noise Assessment produced by WBM Limited
Appendix 9	Air Quality and Odour Assessment produced by Tetra Tech Limited

1. INTRODUCTION

- 1.1 This planning application has been submitted to Gravesham Borough Council (GBC) to allow 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 Site).
- 1.2 The Site extends to approximately 0.7 hectares as shown within the red line boundary on the accompanying drawings. The Site lies within the administrative boundary of GBC 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.
- 1.3 The Site sits within a wider parcel of land currently under the control of the Applicant which is used for the storage of highway grade bitumen which is imported via shipping tankers through the existing deep water jetty facility.
- 1.4 The Site has an extensive history associated with industrial uses and was originally home to the Imperial Paper Mills. More recently, planning permission was granted by GBC on 29 June 2018 to enable retrospective permission for the retention of four additional bitumen storage tanks and ancillary equipment including an activated carbon filter unit, mixing plant and enclosed retaining bund wall.
- 1.5 PDE Consulting Limited has been appointed to prepare the Planning Application on behalf of F M Conway Limited (the Applicant) in liaison with company representatives and external consultants.
- 1.6 A Screening Opinion was issued by Gravesham Borough Council, dated 20 December 2021 which confirmed that the proposed development does not need to be subject to an Environmental Impact Assessment (EIA). A copy of the EIA Screening Opinion can be found at Appendix 1.

2. THE APPLICANT COMPANY

- 2.1 FM Conway delivers the infrastructure services to support, develop and maintain the UK's vital transport networks, built environment and open spaces.
- 2.2 Working on behalf of both communities and businesses, they have developed a self delivery model which combines in-house consultancy expertise with front line operational excellence. From initial inspection through to design, delivery, refurbishment works and ongoing maintenance, this approach enables FM Conway to supply all of the services required to keep the nation's infrastructure and open spaces operating effectively and efficiently.
- 2.3 With more than 60 years' experience, they have worked with many local authorities and commercial organisations to provide integrated and cost effective, sustainable solutions. Renowned for their flexible and creative approach and excellent customer service, working collaboratively with customers to become a valuable project partner.

3. THE SITE

- 3.1 The Site, can be seen on Drawing Number KD.IMP.D.001 and extends to approximately 0.7 hectares comprising the land shown within the red line boundary on the accompanying drawings. The Site lies within the administrative boundary of GBC, sitting 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.
- 3.2 Presently, the Site comprises of previously developed land under the control of the Applicant, including an area of car parking located to the south of Clifton Marine Parade, vacant land located adjacent to the east of the technology laboratory and land currently used for general storage located to the west of The White House.
- 3.3 The Site and much of the adjacent land falls under 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. The wider consented operations consist of facilities used for the importation, storage and distribution of bitumen in addition to research and development facilities comprising a UKAS accredited laboratory located within The White House. These facilities form the Applicant's primary in-house development facilities in which new bituminous products are designed and tested.
- 3.4 Access to the Site comes from an existing access off Clifton Marine Parade, from where vehicles can access the wider highway network.
- 3.5 The Site is not within any nationally designated landscape i.e. National Park or Area of Outstanding or Natural Beauty. There is one Scheduled Ancient Monument within one kilometre of the Site, Gravesend Blockhouse, located approximately 1.0 kilometre east of the Site. There are a number of Listed Buildings located within one kilometre of the Site, the nearest being Rosherville Quay Walls, Steps, Drawdock and WWII Mine Watching Post, located approximately 105 metres west of the Site. The Site is also situated within close proximity to the Lansdowne Square Conservation Area, located to the west.
- 3.6 There are no statutory sites of International importance within 2 kilometres of the Site. The nearest Site of Special Scientific Interest (SSSI) is Bakers Hole SSSI, although it is located some distance away, approximately 2.6 kilometres to the west of the Site.
- 3.7 There are no statutory sites of International importance within 2 kilometres of the Proposed Development. The Thames Estuary and Marshes Ramsar Site is located approximately 3.2 kilometres east of the Site.

Existing Situation

- 3.8 The Applicant's existing operations at Imperial Wharf comprise of the importation, storage and distribution of bitumen products. At present, the land to which this application relates comprises

of an area of vacant land, in addition to land used for car parking and general storage. The current situation is shown on Drawing Number KD.IMP.D.003.

Gravesend Borough Council

4. THE PROPOSALS

Introduction

- 4.1 This planning application has been submitted to GBC to allow 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.
- 4.2 Within this document the aforementioned proposals are referred to as the Proposed Development.
- 4.3 The Proposed Development, as shown on Drawing Number KD.IMP.D.004, comprises of four main aspects: the two additional bitumen storage tanks/ silos; the load out gantry; the emulsion plant; and the provision of alternative car parking.
- 4.4 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.
- 4.5 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 from 2009-2015, meaning that the supply of bitumen is less reliable.
- 4.6 In addition, this need to increase resilience is particularly pertinent in the current global climate with supply chains struggling to keep up with demand post-Covid, leading to widespread delays in the supply of goods and products. It is important, therefore, to build resilience in the UK through the provision of additional bitumen storage capacity in order to safeguard against delays.
- 4.7 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.
- 4.8 To facilitate the construction of the Proposed Development it will be necessary, in the first instance, to create a suitable platform within the Site for the infrastructure to be placed upon. This shall involve the minor re-profiling of the existing ground contours to those required for the development. This may necessitate the off-Site removal of a nominal amount of surplus materials which will be taken to an appropriate facility for recycling where possible.

- 4.9 Once the Site has been re-graded, appropriate materials shall be imported to form the footprint of the operational area. Foundations for the finished surfacing and any necessary foundations, infrastructure etc shall be installed at this stage, together with any service media.
- 4.10 The land upon which the proposed bitumen tanks are to be constructed is to be laid to concrete hardstanding surrounded by a 4.5m high bund wall. The emulsion plant is to be housed within a container and consequently limited enabling works are required for this aspect. The main enabling works associated with the emulsion plant shall be required for the installation of the two emulsion tanks. The enabling works for the load out gantry are expected to be relatively simple and comprise of establishing the foundations upon which the gantry will sit and the installation of service media. The Site already benefits from good access and no changes are proposed in this regard.
- 4.11 The main components of the Proposed Development including the bitumen storage tanks, elements of the emulsion plant and load out gantry are of modular design and therefore relatively easy to erect once the initial preparatory works have been completed. Nevertheless, it is expected that the construction phase will take a few months with a further period required thereafter whilst the new tanks are commissioned.

Bitumen Storage Tanks

- 4.12 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 a safe working level of 3,000 tonnes of bitumen per tank. The elevations of the new tanks are shown on Drawing Number KD.IMP.D.005.
- 4.13 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.
- 4.14 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.
- 4.15 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

- 4.16 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. Some additional spaces will also be made available on land to the south of the new load out gantry. It is not envisaged that any significant enabling works would be required to facilitate the use of this land for car parking, save for the installation of drainage.

- 4.17 The alternative car parking shall make provision for 36 spaces of which three are designated disabled. The proposed car parking provision has been calculated in accordance with local parking standards and is sufficient for the staff based at Imperial Wharf with a significant margin available for any unforeseen circumstances.
- 4.18 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. The proposed car parking arrangements can be seen on Drawing Number KD.IMP.D.004.

Emulsion Plant

- 4.19 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.
- 4.20 The emulsion plant will be used to process 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.
- 4.21 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

- 4.22 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.
- 4.23 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.
- 4.24 Historically this land has been used for HGV parking and general storage in connection with the Applicant's wider consented operations. The land to the west of the load out gantry shall continue to provide some HGV parking and provision has been made within the wider Site such that there continues to be sufficient parking and storage space to meet the Applicant's needs.

Operation of the Proposed Development

- 4.25 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.
- 4.26 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. It is not expected that the Proposed Development would significantly alter the number of deliveries required. The additional storage capacity simply enables the facility to accept larger deliveries of bitumen in order to increase its resilience against any delays in shipments.
- 4.27 Through the use of the existing wharf the Proposed Development maximises the use of sustainable transport as the import of bitumen via shipping tanker removes the need for a significant number of HGV movements through the transport of bitumen via road. This represents a significant carbon reduction when contrasted against the use of HGVs to transport the equivalent quantity of bitumen into the region from elsewhere.
- 4.28 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.
- 4.29 The imported bitumen shall be stored within the Site under carefully controlled conditions until such time that it is required for export. As mentioned previously, the new storage tanks shall be situated on an impermeable base surrounded by a 4.5m high bund wall which is designed to contain any spillages in the unlikely event of any spillage occurring.
- 4.30 Bitumen leaves the facility in dedicated road tankers with an average payload of 29 tonnes. The bitumen is consumed both by the Applicant, at its existing asphalt operations and also offered to the wider market.
- 4.31 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), however this can vary slightly. These movements are spread across the 24 hour operation of the Site.
- 4.32 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 as well as the export of bitumen emulsion.
- 4.33 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.

- 4.34 Considering now the operation of the bitumen emulsion plant. Bitumen emulsion forms a crucial component used in road surfacing and repairs. The emulsion effectively forms a 'glue' which is used to treat underlying or adjacent surfaces prior to the placement of asphalt surfacing so that the new asphalt layer can bind to the existing surface and does not become easily detached once under load from road traffic.
- 4.35 The emulsion plant shall utilise the bitumen which will be pumped from the wider storage facility before undergoing processing within the plant. During processing the bitumen will enter a mixing tank within which a number of emulsifiers and additives will be added in specific quantities order to form the emulsion. These additives shall be stored in a container next to the mixing tank and it is expected that there will be approximately 1-2 deliveries of these additives per week which shall arrive at the Site via HGV.
- 4.36 The finished emulsion will be stored under carefully controlled conditions within tanks located adjacent to the main emulsion plant until such time that it is required for export. As and when required, the emulsion will be pumped into HGV tankers and transported via road to its final destination.

Operating Hours

- 4.37 Owing to the nature of the existing facility it is unrestricted in terms of operating hours. It is proposed that the existing unrestricted operating hours would be retained in respect of the Proposed Development.

Lighting

- 4.38 As it will be necessary for the proposed development to operate during hours of darkness it will be necessary for lighting to be provided to illuminate the Site. The Site currently benefits from existing lighting which is already in place at the facility, although it may be necessary for additional lights to be installed in respect of the Proposed Development.
- 4.39 No fixed lighting shall be erected or installed until details of the location, height, design and luminance have been submitted to and approved in writing by the planning authority. The details shall ensure the lighting is designed to minimise the potential nuisance of light spillage.

Employment

- 4.40 The existing bitumen storage facility currently employs 26 full time employees working on shifts. The levels of employment at the Site are proposed to remain broadly the same as current levels in light of the Proposed Development.
- 4.41 The Proposed Development will continue to support a number of other roles including tanker drivers and other intermittent support personnel and managers. The import of bitumen via shipping tankers also provides employment opportunities for those associated with the wharfage and local shipping.

5. SITE PLANNING HISTORY

- 5.1 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.
- 5.2 The Imperial Paper Mills site, including the wharf/jetty, was acquired by TBF Thompson following closure of the paper mills and part of the site was temporarily used for the manufacture of asphalt pending its redevelopment.
- 5.3 The recent planning history of relevance to the Site has been identified through pre-application discussions with GBC in addition to an online search using GBC's planning pages.
- 5.4 Planning permission was granted in 1989 for three units of offices on the site in 1989 and details of their siting and design were approved in 1993 in accordance with planning permission reference 19930609 but was never implemented.
- 5.5 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.
- 5.6 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.
- 5.7 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.

6. ENVIRONMENTAL CONSIDERATIONS

Landscape and Visual Impact

- 6.1 A Landscape and Visual Impact Assessment (LVIA) has been produced by Kedd Limited to support the application for the Proposed Development. A copy of the LVIA can be found at Appendix 2 and the main findings are summarised below.
- 6.2 The LVIA combines both a desktop appraisal and Site survey works to identify the baseline landscape character and visual nature and condition of the Site and its local area. From this baseline the LVIA considers the potential areas which the Proposed Development may influence and any associated impacts of this upon identified sensitive receptors.
- 6.3 The Site is not located within 2.0 kilometres of a nationally designated Site (i.e. A National Park or Area of Outstanding Natural Beauty). Other designations that lie within 2.0 kilometres of the Site which may be indirectly affected by the Site include; a scheduled ancient monument (Gravesend Blockhouse) located approximately 1.0 kilometre to the west of the Site; a registered park and garden located approximately 1.1 kilometres to the south/ southeast; and a series of small Conservation Areas.
- 6.4 The LVIA identifies three Conservation Areas which are considered to hold influence on the Site / Site setting with a degree of potential intervisibility. These are the Lansdowne Square Conservation Area, the Overcliffe Conservation Area, and the High Street Conservation Area.
- 6.5 Due to the principally urban nature of the LVIA study area there are numerous listed buildings within 2.0 kilometres of the Site. The closest listed buildings / assets are the Rosherville Quay Walls, Steps, Drawdock and WWII Mine Watching Post, located approximately 105 metres to the west of the Site, the Rosherville Gardens Bear Pit and Cliff Top Entrance, located approximately 277 and 470 metres to the south west respectively, together with the Hazards House and Former Brewery Officers, located approximately 515 metres to the east.
- 6.6 At a national level the Site is located on the boundary of National Character Areas (NCA) 113 North Kent Plain and NCA 81 Greater Thames Estuary, being located on land to the southern boundary of the River Thames. To the northern bank of the River Thames, land falls within the Northern Thames Basin NCA 111.
- 6.7 At a regional scale the Site falls within an area classified as Urban within the Kent Landscape Character Assessment, and is not located within proximity to, or with intervisibility, of the wider defined Kent Landscape Character Areas.
- 6.8 Within the Thurrock Landscape Character Assessment, land to the north of the River Thames, within relative proximity and intervisible with the Site, is defined by Thurrock as E5 Tilbury and Docks Urban Area and C3 Tilbury Marshes.

- 6.9 At the Site level, character is defined by a combination of the existing industrial use of the Site and its associated elements and features, together with those of the industrial commercial business and retail park which surrounds it, and the River Thames corridor which forms the Site's northern boundary.
- 6.10 The landscape character associated with the Gravesham urban area within which the Site is located is considered to be of Low to Medium Sensitivity to change, to the type of development proposed. The townscape character associated with the Site and its immediate mixed urban context is also considered to be Low to Medium Sensitivity.
- 6.11 The urban area surrounding the Site, is comprised of large scale industrial / commercial / retail shed structures, together with the existing FM Conway Imperial Wharf Bitumen Terminal. The built morphology of the Imperial Business Park comprises blocks of built footprint and also separate landscape scale urban structures. The existing Imperial Wharf structures reflect the individual River Thames corridor activities and built forms that are observed along both sides of the embankment, with both urban and urban fringe settings.
- 6.12 The relatively small-scale of the elements of Proposed Development would be located within brownfield sites adjacent to / in proximity to the same / similar structures. The resulting Magnitude of impact is considered as Low for both the urban landscape character area and townscape area. The Low to Medium Sensitivity combined with the Low Magnitude, resulting in a potential Very Slight to Slight Adverse Significance of Effects. This is not a Significant Adverse effect on either landscape character or townscape.
- 6.13 In addition to the above the LVIA highlights that the Lansdowne Square and Overcliffe Conservation Areas were designated in 1995 and 1990, i.e. pre development of some of the large scale and mass shed form character component / land uses of the Imperial Business and Retail Park which were considered acceptable in respect of the Conservation Area status and policies.
- 6.14 The magnitude of the Proposed Development has been assessed in respect of the Conservation Area Landscape Character and with a resulting Moderate Adverse Effect. This effect is not a Significant Level. The High Street Conservation, which is also within relative proximity to the Site, does not however afford intervisibility with the Site. As such, it is assessed that effects would be Neutral i.e. no change to the character of the conservation area.
- 6.15 Of the 20 typical representative receptors/receptor location points identified within the LVIA it is assessed that no receptor will receive a significant adverse visual effect as a result of the Proposed Development. Mitigation measures, including the proposed colours of new structures, will help to integrate the proposals into the local visual setting.
- 6.16 In respect of potential cumulative visual effects that could be caused by combined visibility, no significant adverse impacts are assessed to occur. There is a new residential housing development currently constructed/under construction approximately 250 metres to the west of the Site off the junction of Crete Hall Road and the Shore. This development is, however, screened from the Site by both landform and intervening built structures with the more visible housing site entrance already landscaped and properties built. Overall there will be no Significant cumulative effects associated with the Proposed Development in combination with any other known development.

- 6.17 In conclusion, based on landscape character, townscape and visual grounds the Site is in an appropriate location for additional bitumen facilities associated with FM Conway Imperial Wharf Terminal and Technology Centre. The proposals will not result in any significant adverse impacts on either landscape or visual receptors. As such it will also be in accordance with landscape and visual orientated national and Gravesham Local Core Strategy Policies.

Transport

- 6.18 A Transport Statement has been prepared by the Hurlstone Partnership on behalf of the Applicant in respect of the Proposed Development. A copy of the Transport Statement can be found at Appendix 3 and is summarised below.
- 6.19 Other than parking areas, the existing bitumen terminal sits on the north side of Clifton Marine Parade, 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 215 metres 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 a minor arm cul-de-sac serving the Site and the service yard to units within the Imperial Retail Park, which lies to the south.
- 6.20 Access to the western HGV parking area of the Site is provided approximately 20 metres from the junction on the north side of Clifton Marine Parade. An additional HGV parking area is accessed approximately 25 metres along the route from the junction on the south side, with the existing private car park access a further 40 metres distant, again on the south side. The access to the car park has a barrier restricting vehicle height to 7 feet / 2.1 metres. The existing car park provides 45 spaces. However, it was apparent that the demand is significantly below that level based on the observed 10 vehicles parked during the site visit.
- 6.21 Approximately 120 metres along the cul-de-sac section of Clifton Marine Parade, 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.
- 6.22 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.
- 6.23 In terms of HGV traffic, the 24 hour turning count undertaken on Wednesday 06 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.
- 6.24 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.
- 6.25 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.

- 6.26 Based upon current staffing at the Site it is apparent that the proposed parking provision includes a significant margin for unforeseen circumstances, even if every member of staff travelled independently by car.
- 6.27 The Applicant currently operates an effective Travel Plan within the company and has committed to reducing the impacts of staff travel. The Applicant 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.
- 6.28 The Applicant has also set a target to 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.
- 6.29 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.
- 6.30 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.
- 6.31 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.
- 6.32 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.
- 6.33 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.

The Water Environment

- 6.34 A Flood Risk Assessment (FRA) has been prepared by BCL Consultant Hydrologists Limited in support of the Proposed Development. A copy of the Flood Risk Assessment can be found at Appendix 4 and is summarised below.

- 6.35 The Site lies within the catchment area of the River Thames, which delimits the northern boundary of the Site. The Gravesend Reach of the Thames is tidal and generally drains in an easterly direction.
- 6.36 The EA Flood Map for Planning (reproduced in appendix FRA1) indicates that the Proposed Development overlaps with a "Flood Zone 3 area that benefits from flood defences".
- 6.37 Land and property in this flood zone would have a high probability of flooding without the local flood defences. These protect the area against a river flood with a 1% Annual Exceedance Probability (AEP) of happening each year (1 in 100 year return period), or a tidal flood from the sea with a 0.5% chance of happening each year (1 in 200 year return period).
- 6.38 The Site is bordered to the north by the Tidal Thames Flood Defence. The defence is predominantly formed of a sheet pile wall with a capping beam and ground anchors in addition to two flood gates, one of which has been temporarily decommissioned. The topographic survey shows that the crest of the wall is at 6.75-6.79 maOD.
- 6.39 In response to the Screening and Scoping Request submitted to Gravesham Borough Council for the Proposed Development the EA has reported that *"a previous inspection of the river wall discovered minor cracks and impact damage in the capping beam plus missing mastic sealant. There is a hole in the concrete wall that sits in front of the flood defence located at the splash zone and if water gets through this to the sheet pile it could cause erosion/corrosion of the sheet pile and erosion of the promenade material"*. In 2019, the residual life of the Flood Defence was predicted as 10 years.
- 6.40 Following receipt of the EA report the Applicant has since commissioned a programme of repair work to rectify the issues with the flood defences including replacing damaged and missing sealant.
- 6.41 The Proposed Development will also not restrict access to the Flood Defence for maintenance and future raising. The Applicant will be installing a traffic protection system (a crash barrier or similar) to mitigate the risk of any vehicles / activities being in collision with the Flood Defence.
- 6.42 With regard to flooding from land the EA Flood Map for Planning indicates that the Site is almost entirely at a 'very low' risk of surface water flooding.
- 6.43 The east/west section of public road, Clifton Marine Parade, is at "high" risk from surface water flooding. The extent of pluvial flooding shows that there is a marginal overlap with the footprint of the two additional bitumen storage tanks; but the risk is mapped as "low".
- 6.44 It is noteworthy that the bitumen storage tanks will be encircled by a bund wall, with a proposed height of 4.5 metres. This will combat any risk of surface water flooding. Any rainwater collecting within the bund enclosure will be emptied by tanker and taken to a licensed facility.
- 6.45 The FRA concludes that, within the context of the Fluvial/Tidal Flood Risk Zoning applying to the Site, the Proposed Development constitutes a "Less Vulnerable" operation and is considered "appropriate development" in terms of flood risk vulnerability.

- 6.46 Assessment has been made of the flood risk that may be posed elsewhere within the catchment by implementation of the Proposed Development. The proposals are considered to be acceptable in this regard.
- 6.47 A surface water drainage strategy has been prepared by Ambiental in respect of the Proposed Development. A copy of the surface water drainage strategy can be found appended to the end of the Flood Risk Assessment and is summarised below.
- 6.48 The British Geological Survey (BGS) Geology of Britain Viewer indicates that the bedrock underlying the Site is a member of the Lewes Nodular Chalk Formation, Seaford Chalk Formation and Newhaven Chalk Formation (undifferentiated) - Chalk (Source: BGS).
- 6.49 Due to proximity of the Site to tidal affected waters that would raise the water groundwater levels during peak tide, location of the proposed structures near the Site's boundaries and potential pollution risks from the Site, it is suggested that infiltration should be avoided and the SuDS system should be lined with impermeable geomembranes to prohibit any discharges to groundwater.
- 6.50 The surface water drainage strategy focusses upon the proposed car and HGV parking areas as well as the area around the proposed load out gantry. The new bitumen storage tanks and emulsion plant have been excluded from the strategy owing to the need to maintain the permeability of these areas to contain liquids in the unlikely event of a spillage.
- 6.51 The proposed drainage scheme is for the discharge of surface water runoff to the surface water sewer which discharges into the River Thames. In accordance with the Kent County Council Drainage and Planning Policy Statement SuDS Policy 2 (pg.26) discharges into tidal areas of rivers do not require attenuation of flows. However, due to potential 'tidelocking' of the outfall into River Thames during high-tide events or storm surges, it is necessary to provide additional storage.
- 6.52 Consequently, the SUDS components have been designed to accommodate and dispose of runoff from storms up to and including the 1:100 year +40% climate change, 6-hour event due to potential 'tide-locking'.
- 6.53 To contain surface water runoff from the Site it is proposed to use underground geocellular crates which would be combined with appropriate oil and sediment treatment systems. The crate storage proposed has a combined capacity of 567m³ which has been calculated based upon the areas to be drained.
- 6.54 The surface water drainage strategy demonstrates that the Proposed Development can be satisfactorily accommodated without worsening flood risk for the area and without placing the development itself at risk of flooding, as per National guidance provided within the National Planning Policy Framework (NPPF) 2021, the National Planning Practice Guidance (NPPG), DEFRA's National Standards for Sustainable Drainage.

Contaminated Land

- 6.55 A ground condition desk top study has been undertaken by Ground Condition Consultants on behalf of the Applicant in support of the Proposed Development. A copy of the report can be found at Appendix 5 and is summarised below.

- 6.56 Historical map extracts from 1866 to 2021 show the Site to have been in industrial use since at least 1866. The earliest available map extracts show parts of the north of the Site to be in use as quays with the remainder of the north of the Site comprising of tidal mud flats associated with the River Thames. Rail tracks crossed both the northern and southern areas of the Site with parts of the southern area of the Site also occupied by a public house and parts of what appears to be a large residential property (Bycliffes).
- 6.57 Between 1923 and 1932, the north of the Site was infilled between the quays to form a continuous wharf extending to the east of the Site. This wharf is noted to have had a series of traveling cranes and a jetty extending into the Thames to the north. During this period, the southwest section of the Site had been redeveloped from being part of the former Bycliffes plot to being part of two larger industrial units, linked with Imperial Paper Mills, which is identified to the southeast of the Site on the 1932 map.
- 6.58 British Geological Survey (BGS) Map extracts indicate the west of the Site to be underlain by Made Ground and Worked Ground with no superficial deposits shown in the southern area and Alluvium shown beneath the northern area. The bedrock geology beneath the whole Site is comprised of chalk.
- 6.59 Due to the historical industrial uses at the Site and the presence of made ground there is potential for contamination to be present, namely, asbestos containing material fragments and fibres within the Made Ground across the Site as a result of the construction and demolition of former structures. In addition there is potential for a range of organic and inorganic contaminants present within the Made Ground across the Site from the historical industrial activities, particularly the former tank areas in the northwest and southwest, and current bitumen activities. There is also potential for ground gas from Made Ground used to reclaim the north of the Site from mud flats.
- 6.60 The risk of impact to identified receptors from the identified potential sources is generally considered to be very low to low/moderate.
- 6.61 Given the low sensitivity of the proposed use and the likely predominance of hard standing in the completed development, the risks to the health of the futures users are considered to be very low.

Ecology

- 6.62 A Preliminary Ecological Assessment (PEA) was produced by Wilkinson Associates on behalf of the Applicant. A copy of the report can be found at Appendix 6 and is summarised below.
- 6.63 There are no sites designated for their International nature conservation value within 1 kilometre of the Site; however, there is one site within the extended 5 kilometres zone of influence (Zoi) for Internationally designated sites: Thames Estuary & Marshes Ramsar, which is located approximately 3.2 kilometres to the east of the Site at its closest point. Taking into account the location, scale and nature of the Proposed Development, potential impacts on this site or on internationally designated sites beyond a 5 kilometre radius are considered to be highly unlikely to occur.

- 6.64 There are no Sites of Special Scientific Interest (SSSIs) or other sites of National importance within the 1 kilometre Zol. There are no non-statutory sites of County or Local importance within the 1 kilometre Zol.
- 6.65 The Site comprises existing industrially developed land with buildings, roads, storage tanks, areas of hardstanding and a deep water jetty. No significant semi-natural habitats are present and vegetation is limited to small fragments.
- 6.66 The Proposed Development will not affect any habitats of ecological importance. The small areas of ephemeral and scrub development around the proposed alternative car parking have been assessed to be of low ecological value at a Site level and their loss will not constitute a significant impact on biodiversity resources.
- 6.67 No fauna species were observed within the Site during the survey or identified during the desk study, and the Site does not support habitat suitable for any protected or notable fauna. No impacts on fauna are therefore anticipated.
- 6.68 The potential for direct or indirect ecological impacts to affect the River Thames has been considered. None of the elements of the Proposed Development have a direct interface with the River Thames and all the proposed structures will be set back from the sea wall. There will be no intensification of operations at the Site. Whilst there will be a small increase in HGV movements, the main objective of the development is one of resilience, so the facility will hold more bitumen but this is unlikely to result in an increase in shipping traffic.
- 6.69 It is proposed that biodiversity enhancement measures be incorporated into the landscaping scheme for the car park area, including the planting of native nectar-rich flowering and fruiting shrub species to provide a foraging resource for invertebrates (e.g. bees) and a food source for birds.
- 6.70 The Assessment concludes that , the Proposed Development will not have any significant adverse impacts on valued ecological resources.

Cultural Heritage

- 6.71 A Cultural Heritage Assessment has been undertaken by Andrew Josephs Associates in support of the Proposed Development. A copy of the report can be found at Appendix 7 and the findings are summarised below.
- 6.72 In order to assess the effects of the potential scheme, cultural heritage information within and up to 1.0 kilometre from the Site was examined. A variety of sources were consulted including the Kent Historic Environment Record (KHER), the Defra Magic Database, Historic England Archive, maps and readily available local history materials. A Site visit was undertaken in May 2021.
- 6.73 Just over 1.0 kilometre to the east is a scheduled blockhouse. The monument includes a 16th century artillery blockhouse surviving as upstanding and buried remains. On the north bank of the Thames, the nearest scheduled monument is also just over 1.0 kilometre north east.

- 6.74 There are no Grade II* structures within 500 metres. The nearest is the Church of St George, Gravesend (715 metres east), the parish church built in 1731-2 and described as having “good townscape value.” There is no visual or historical connection with the Site, and it is not considered further.
- 6.75 One Grade II structure sits within 250 metres of the Site which at its nearest point is approximately 145 metres north west of the proposed tanks and 80 metres west of the proposed truck loading gantry. Rosherville quay walls, steps and draw dock extend along the waterfront, and are listed along with a WWII mine watching post.
- 6.76 Two conservation areas lie within 500 metres of the Site. These are Lansdowne Square and Overcliffe. The Lansdowne Square Conservation Area is centred on the historic core of the Rosherville New Town and is at its nearest boundary 120 metres west of the Site. The Overcliffe Conservation Area encompasses part of the early 19th century Rosherville New Town development in Northfleet and the mid-19th century houses along Overcliffe which were developed as part of this prestigious suburb, directly to the west of Gravesend Town Centre. The Overcliffe Conservation Area is 230 metres south west of the Site at its nearest boundary.
- 6.77 There are no World Heritage Sites, Registered Battlefields or Historic Parks and Gardens within 1 kilometre of the Site.
- 6.78 A site visit was carried out in May 2021. The current setting of the one listed structure and two conservation areas was examined and views to and from them assessed, without entering onto private land. Google Earth was also used as a tool to understand setting and context within the wider townscape.
- 6.79 Three assets are situated within 500 metres of the Site that could potentially be affected by the Proposed Development. These are the Rosherville quay walls, steps and draw dock, the Lansdowne Square Conservation Area and the Overcliffe Conservation Area.
- 6.80 There no views of the Site from the central part of the Rosherville quay walls, steps and draw dock due to a 1970s era block of flats. From the eastern limit of the listed structure there are filtered or screened views of the proposed tanks. There would be clear views of the proposed truck-loading gantry.
- 6.81 There are no views from the core of the Lansdowne Square Conservation Area to the Site at ground level. It would appear that views are limited to upstairs windows from the rear of properties on Pier Road. Although visible from upper floor windows on the rear elevations of Pier Road, the proposed tanks would blend in with the industrial landscape, and the form and mass of the existing tanks and commercial development adjacent.
- 6.82 There would be no views at ground level of the Proposed Development from the villas on Overcliffe, nor any other publicly accessible part of the Conservation Area due to tree screening along Overcliffe. Although not accessible, it is not considered that views of the Proposed Development would be possible from upstairs windows. This is because the villas stand back from the edge of the cliff and views are likely to ‘fly over’ the industrial development below towards the Thames in the distance. Even if there are views of the Proposed Development, the massing will be completely absorbed into the Thameside industrial landscape.

6.83 It is concluded that there would be:

- Minor effects of slight significance upon archaeology;
- An adverse effect of moderate magnitude upon views of a proposed truck-loading gantry from a Grade II listed quay wall and associated structures;
- A negligible adverse effect of no significance upon views from the core of Lansdowne Square Conservation Area;
- No effect upon views or the setting of Overcliffe Conservation Area.

6.84 Having regard to Historic England guidance it is concluded that there would be no effect upon our ability to appreciate the significance of any designated assets. The Proposed Development therefore fully accords with both local and national cultural heritage policy.

Noise

6.85 A Noise Assessment has been undertaken by WBM Limited in support of the Proposed Development. A copy of the Assessment can be found at Appendix 8 and the findings are summarised below.

6.86 The report sets out the calculated noise levels arising from the operation of the existing and proposed facilities, for use in a BS 4142:2014+A1:2019 assessment for the nearest dwellings to the Site.

6.87 The calculated noise levels are compared with representative background sound levels at the nearest dwellings. These have been determined from attended noise surveys in January and May 2022.

6.88 The Site currently operates in accordance with planning permission reference 20160800, dated 29 June 2018 which specifies noise limits in accordance with Condition 5 which requires that *"The background (LA90) noise level in the absence of the ancillary equipment operations including activated carbon filter unit and mixing plant shall not be exceeded at the boundary of any noise sensitive receptor by more than 3dB. Any measurement carried out shall be made with reference to BS4142:2014"*.

6.89 Ellandaye House/Warren Hastings Court are the nearest receptors to the existing site, located adjacent to The Shore and approximately 15 metres from the nearest boundary of the existing site (the yard and offices) and approximately 140 to 150 metres from the proposed bitumen storage tanks.

6.90 The nearest dwellings along Pier Road are approximately 50 metres from the boundary of the existing site and approximately 160 to 180 metres from the proposed storage tanks. Two large commercial units are located in between the dwellings along Pier Road and the proposed storage tanks.

6.91 Six 15-minute attended daytime sample measurements were taken over two separate days on 25 and 26 January 2022 at the nearest dwellings to the west of the Site (four measurements in the vicinity of Ellandaye House/Warren Hastings Court and two in the vicinity of the nearest dwellings

on Pier Road). Further baseline measurements could not be obtained at those locations due to the presence of temporary noisy local activity.

- 6.92 In order to obtain comprehensive data for the night-time period, a data logging sound level meter was installed outside the second storey window of the FM Conway offices in The White House. However, the background sound levels measured by the installed sound level meter were controlled by local site and commercial noise sources and were higher than the daytime background sound levels measured at the nearest dwellings.
- 6.93 The data from the installed meter was not used in the assessment and an additional attended night-time survey was undertaken at the nearest residences in the early hours of Friday 06 May 2022.
- 6.94 It is noted during the survey work that the existing site operations were inaudible throughout the daytime measurements and only just audible at times during the night-time measurements.
- 6.95 Site noise calculations for both the existing site operations and proposed site operations were undertaken using SoundPLAN noise mapping software.
- 6.96 The daytime baseline measurements and assessment demonstrate a rating level of 39 dB LAr, Tr at Ellandaye House/Warren Hastings Court which is 7 dB below the average background sound level of 46 dB LA90, T for Ellandaye House/Warren Hastings Court and 3 dB below the lowest measured background sound level of 42 dB LA90, T for Ellandaye House/Warren Hastings Court. The daytime residual level at Ellandaye House/Warren Hastings Court is 60 dB LAeq,T.
- 6.97 The conclusion is that the assessment indicates no adverse impact at Ellandaye House/Warren Hastings Court during the daytime.
- 6.98 The night-time representative sound levels and assessment demonstrate a rating level of 39 dB LAr, Tr at Ellandaye House/Warren Hastings Court which is no more than the representative background sound level of 39 dB LA90, T for Ellandaye House/Warren Hastings Court, which was also the lowest measured background sound level at that location. The representative night-time residual level at Ellandaye House/Warren Hastings Court is 52 dB LAeq,T.
- 6.99 The conclusion is that the assessment indicates no adverse impact at Ellandaye House/Warren Hastings Court during the night-time.
- 6.100 The baseline measurements and assessment demonstrate a rating level of 40 dB LAr, Tr at the nearest dwellings on Pier Road which is 4 dB below the average daytime background sound level of 44 dB LA90, T for Pier Road and 2 dB below the lowest measured background sound level of 42 dB LA90, T for Pier Road. The daytime residual level at Pier Road is 49 dB LAeq,T.
- 6.101 The conclusion is that the assessment indicates no adverse impact at the nearest dwellings on Pier Road.
- 6.102 The night-time representative sound levels and assessment demonstrate a rating level of 40 dB LAr, Tr at the nearest dwellings on Pier Road which is no more than 2 dB above the representative background sound level of 38 dB LA90, T for Pier Road, which was also the lowest measured background sound level at that location. The representative night-time residual level at Pier Road Court is 40 dB LAeq,T.

- 6.103 The conclusion is that the assessment indicates no adverse impact at the nearest dwellings on Pier Road during the night-time.

Air Quality and Odour

- 6.104 An Air Quality and Odour Assessment has been produced by Tetra Tech in support of the Proposed Development. A copy of the Assessment can be found at Appendix 9.
- 6.105 The impact magnitude of the effects during the operational phase of the development is based on the latest guidance produced by EPUK and IAQM in January 2017.
- 6.106 The main source of air pollution in the Borough is road traffic emissions from major roads, notably the A2, A226 and A227. The National Air Quality Standards Objective for Nitrogen Dioxide has been exceeded in six areas of the borough. Particulate matter (PM10) has also been in exceedance of the relevant objective in the Northfleet Industrial Area. Therefore Gravesham Borough Council has declared seven Air Quality Management Areas (AQMAs).
- 6.107 The Site is located within the Northfleet Industrial Area Air Quality Management Area.
- 6.108 In order to consider the air quality impacts of the burners on the local air quality, a quantitative assessment using the third generation Breeze AERMOD dispersion model has been undertaken. AERMOD is a development from the ISC3 dispersion model and incorporates improved dispersion algorithms and preprocessors to integrate the impact of meteorology and topography within the modelling output.
- 6.109 Gas and dual-fuel heaters/burners are used for heating the bitumen storage tanks. Natural gas is used as fuel in normal operation and diesel fuel is a backup fuel only. It is proposed to install a new oil heater for the two new bitumen storage tanks.
- 6.110 The dispersion modelling has assessed impact of emissions from the oil heaters taking into consideration of the operation of the proposed installation.
- 6.111 The predicted long-term and short-term NO₂ concentrations from the emissions of the operation of the existing and the proposed gas burners are all below the relevant AQOs for the protection of human health. The significance of effects on the emissions on the ground level receptors from the burner operations with respect to long-term NO₂ is determined to be 'negligible'.
- 6.112 The annual mean and daily (24 hour mean) NO_x PEC at the ecological receptors from the burner operations are below the relevant critical level for the protection of vegetation and Ecosystems. The NO_x impacts from the proposed development on the ecological receptors are insignificant.
- 6.113 The transfer of bitumen to and from both the existing tanks and the proposed additional tanks will be by pumping through sealed, insulated pipework. The air displaced when filling any tank would be captured and passed through an in-line activated carbon filter to control the odour. Most of odour will be removed by the filter, however, it is likely there will be small amount of the residual odour being released.

- 6.114 Another potential odour release source would be the filling of lorry tanks when odorous air of the lorry tank is being displaced by the bitumen.
- 6.115 The odour emissions from the operations of the existing bitumen tanks and two proposed bitumen tank operations were assessed and the maximum predicted odour concentration at sensitive/residential receptors is below the odour benchmark. The odour effects from the Site operations on the sensitive receptors are insignificant.
- 6.116 Overall it is concluded that the Proposed Development is not considered to be contrary to any local or national planning policies with respect to air quality or odour.

7. DESIGN AND ACCESS STATEMENT

Introduction

- 7.1 A Design and Access statement should consider aspects such as the amount of development, the layout, its scale, any landscaping proposals, appearance and access to the development. The statement contained below has regard to the fact that the Application Area is contained within privately owned land and members of the general public are not permitted on Site due to the nature of the premises.

Amount of Development

- 7.2 The application Site measures approximately 0.7 hectares and is comprised of the land upon which the new bitumen storage tanks, emulsion plant, load out gantry and alternative car parking will be situated upon. The amount of development is the minimum required for the Proposed Development to function. It is limited to the basic elements which are required for the storage and distribution of bitumen as described above.
- 7.3 Alternative car parking is provided on land to the west of The White House to compensate for the loss of parking from the area where the two additional bitumen storage tanks are to be located. The amount of parking provided is appropriate to the existing facility and shall ensure that there is no long term loss of parking provision.
- 7.4 With regard to the alternative car parking, this has been calculated based upon local parking standards. The amount of spaces is a slight reduction from the existing situation but still offers a considerable margin based upon levels of activity at the Site. The proposed alternative car parking makes provision for 3 disabled parking spaces and 3 dedicated motorcycle spaces are also offered which are not currently available at the facility.

Layout

- 7.5 The layout of the Proposed Development has been designed in such a way so as to be as operationally efficient as it reasonably can be and care has been had to design the Site in such a way so as to minimise, as far as can be reasonably predicted, the occurrence of accidents.
- 7.6 All of the main constituent materials required for each of element of the proposals are located within close proximity to where they are required and they have been laid out in such a way as to reduce emissions associated with the transport of those materials around the Site.
- 7.7 As to vehicular movements which are a potential source of accidents, staff parking has been located in a place away from the main operational areas. HGVs associated with the Proposed Development shall follow a one way vehicle route.
- 7.8 Loose plant shall not be required to operate in areas where HGVs or private cars travel. The layout has been designed with optimum efficiency and safety in mind.

Scale

- 7.9 The scale of the Proposed Development is as large as is required to perform its function efficiently and safely and it is consistent with the surrounding land uses. It is at such a scale so as not to conflict with surrounding land uses.
- 7.10 Consideration has been made to the potential visual impacts arising from the Proposed Development upon neighbouring receptors, including the Lansdowne Square Conservation Area, located to the west. The surrounding topography and medium to large scale industrial, commercial and retail structures ensure that the visual impacts arising from the development are kept to a minimum.

Landscaping

- 7.11 The two new bitumen storage tanks will be surrounded by a 4.5 metre high bund wall which is designed to contain any spillages in the unlikely event of any spillage occurring. This shall also provide some low level screening of operations, but due to the industrial location of the Site and its immediate surrounds, no additional landscaping is proposed within this application.

Appearance

- 7.12 The appearance of the Proposed Development is fully illustrated on the attached drawings.

Access

- 7.13 Vehicular access for the Site initially comes from the public highway network which can readily accommodate the Proposed Development traffic. Existing access points from Clifton Marine Parade shall be used in the same manner that they are at present.
- 7.14 Shipping tankers making deliveries of bitumen shall use the existing wharf facilities in the same manner that they do at present. These facilities have been in place for many years and this application does not propose any alterations.
- 7.15 The internal layout of the Site and working practices shall prevent unauthorised access for vehicles and employees and the Site will not be open to the general public.
- 7.16 The Proposed Development shall not alter the existing access arrangements which are employed at the facility. The land upon which the Site sits is in private ownership, so the wider general public are prohibited from entering the premises.

8. PLANNING POLICY CONSIDERATIONS

- 8.1 Section 38(6) of the Planning and Compulsory Purchase Act 2004 requires that all planning applications be determined in accordance with the Development Plan unless material considerations indicate otherwise.
- 8.2 The adopted development plan comprises:
- Gravesham Local Plan Core Strategy Adopted September 2014
 - Gravesham Local Plan First Review 1994
- 8.3 Other policies which constitute material planning considerations, including National Government Policy comprise:
- National Planning Policy Framework Revised July 2021

Gravesham Local Plan Core Strategy Adopted September 2014

- 8.4 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.

Policy CS01: Sustainable Development

- 8.5 Planning applications that accord with the policies in the development plan for Gravesham will be approved without delay, unless material considerations indicate otherwise.
- 8.6 When considering development proposals 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. It will work proactively with applicants jointly to find solutions which mean that proposals can be approved wherever possible, and to secure development that improves the economic, social and environmental conditions in the area.

Policy CS02: Scale and Distribution of Development

- 8.7 The development strategy for the borough prioritises development in the urban area as a sustainable location for development. This will be achieved by:
- Promoting regeneration by prioritising the redevelopment and recycling of underused, derelict and previously developed land in the urban area. This will be principally through redevelopment of former industrial sites in the Opportunity Areas of Northfleet Embankment and Swanscombe Peninsula East, and Gravesend Riverside East and North East Gravesend to create new residential neighbourhoods and employment areas.

Policy CS03: Northfleet Embankment and Swanscombe Peninsula East Opportunity Area

- 8.8 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.
- 8.9 A small undeveloped area adjacent to the western end of the former Clifton Marine Parade, the White House offices and Imperial Wharf complete the site. Except for possible rounding-off of employment uses, it is not anticipated that this sub-area will be subject to substantial change over the plan period. Subject to the need for planning permission, the Council will support proposals for bringing Imperial Wharf back into a river based use that is appropriate to context.

Policy CS07: Economy, Employment and Skills

- 8.10 In conjunction with the private sector and its regeneration partners, the Council will seek to secure the delivery of around 186,490 sq m gross new employment floorspace over the plan period focusing on the following:
- a major new B1/office employment centre as part of a wider mixed use sustainable development of Ebbsfleet;
 - office, industrial and warehousing facilities on Key Sites in the Swanscombe Peninsula and Northfleet Embankment Opportunity Area;
 - office development in Gravesend Town Centre as well as retail, culture and leisure (see Policy CS05);
 - office, industrial and warehousing development on Key Sites in the Gravesend Riverside East and North East Gravesend Opportunity Area; and
 - office and light industrial development in the form of an enterprise centre/ incubation space on greenfield land South of Coldharbour Road, Northfleet.
- 8.11 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.

Policy CS11: Transport

- 8.12 New developments should mitigate their impact on the highway and public transport networks as required. As appropriate, transport assessments and travel plans should be provided and implemented to ensure the delivery of travel choice and sustainable opportunities for travel.
- 8.13 Sufficient parking in new development will be provided in accordance with adopted parking standards which will reflect the availability of alternative means of transport and accessibility to services and facilities.

Policy CS12: Green Infrastructure

- 8.14 Policy CS12 states that Sites designated for their biodiversity value will be protected, with the highest level of protection given to internationally designated Special Protection Areas, Special Areas of Conservation and Ramsar sites, followed by nationally designated Sites of Special

Scientific Interest, followed by Local Wildlife Sites and then by other areas of more local importance for biodiversity.

- 8.15 There will be no net loss of biodiversity in the Borough, and opportunities to enhance, restore, re-create and maintain habitats will be sought, in particular within the Biodiversity Opportunity Areas shown on the Strategic Green Infrastructure Network map and within new development.
- 8.16 Where a negative impact on protected or priority habitats/species cannot be avoided on development sites and where the importance of the development is considered to outweigh the biodiversity impact, compensatory provision will be required either elsewhere on the site or off-site, including measures for ongoing maintenance.

Policy CS18: Climate Change

- 8.17 With the exception of the previously developed sites along the Thames Riverside (see Policies CS03, CS04 and CS05) and those other regeneration sites which have already been evaluated in accordance with the sequential and exception tests at the application stage, development will be directed sequentially to those areas at least risk of flooding.
- 8.18 Proposals in areas at risk of flooding must be accompanied by a Flood Risk Assessment (in accordance with national policy and Environment Agency standing guidance as appropriate) and a Flood Risk Management Plan (if required) to demonstrate that they are adequately defended and safe over their lifetime. Planning permission will be refused for schemes which do not pass the sequential and exception tests.
- 8.19 The Council will seek to minimise the impact of drainage from new development on waste water systems. In particular, the Council will:
- Require that surface water run-off from all new development has, as a minimum, no greater adverse impact than the existing use; and
 - Require the use of Sustainable Drainage Systems on all developments where technically and financially feasible.

Policy CS19: Development and Design Principles

- 8.20 New development will be visually attractive, fit for purpose and locally distinctive. It will conserve and enhance the character of the local built, historic and natural environment, integrate well with the surrounding local area and meet anti-crime standards. The design and construction of new development will incorporate sustainable construction standards and techniques, be adaptable to reflect changing lifestyles, and be resilient to the effects of climate change.
- 8.21 A number of criteria are set out which development proposals should achieve. These include:
- Taking account of the scale, height, building lines, layout, materials and other architectural features of adjoining buildings. Account will also be taken of the wider site context, including strategic views, site topography, the significance of heritage assets and features of townscape and landscape value which contribute to local character and sense of place;

- New development will be located, designed and constructed to:
 - Avoid adverse environmental impacts from pollution, including noise, air, odour and light pollution, and land contamination; and
 - Not pose an unacceptable risk or harm to the water environment, including the quality and/or quantity of ground waters, surface waters, wetlands and coastal water systems;
- Car parking will be well related to the development it serves;
- The design and layout of new development will take advantage of opportunities to build in resilience to the effects of climate change. This will include protection against flood risk, where relevant, delivering carbon reduction, provision for low carbon and renewable energy, and minimising energy consumption and water use;
- New development will incorporate appropriate facilities for the storage and recycling of waste.

Policy CS20: Heritage and the Historic Environment

- 8.22 The Council will accord a high priority towards the preservation, protection and enhancement of its heritage and historic environment as a non-renewable resource, central to the regeneration of the area and the reinforcement of sense of place.
- 8.23 When considering the impact of a proposed development on a designated heritage asset, the weight that will be given to the asset's conservation value will be commensurate with the importance and significance of the asset. For non-designated assets, decisions will have regard to the scale of any harm or loss and the significance of the heritage asset.

Gravesham Local Plan First Review 1994

- 8.24 The Gravesham Local Plan First Review was originally adopted in 1994. A substantial number of policies of the Gravesham Local Plan First Review were saved by a Direction dated 25 September 2007 of the Secretary of State under paragraph 1 (3) of Schedule 8 to the Planning and Compulsory Purchase Act 2004 as transitional arrangements pending adoption of the Core Strategy.
- 8.25 Those Local Plan First Review policies that remain in force are listed in Appendix 1 of the Local Plan Core Strategy. The remaining saved policies will be replaced following the adoption of the Site Allocations and Development Management Policies Development Plan Document.
- 8.26 Saved policies which are replaced in part remain part of the Development Plan. In these cases, both old and new policies remain part of the Development Plan. Where there is a difference, greater weight should be given to the Core Strategy policy.
- 8.27 The saved policies of relevance to the Proposed Development are as follows:

Policy TC3

- 8.28 The Borough Council will adopt the following approach to applications for development within or affecting conservation areas:

- i) Where development is acceptable in relation to other policies in this Plan, it will be carefully judged for its impact and will be expected to make a positive contribution to the conservation area. The Borough Council will expect applications to contain sufficient details to enable the impact of the proposal upon the conservation area to be assessed.

Policy T1

- 8.29 The Local Planning and Highway Authorities will consider the impact on the transport system and on the environment of traffic generated by new development and will wish to ensure that all proposed developments are adequately served by the highway network identified on the Proposals Map.

Policy T2

- 8.30 The Local Planning and Highway Authorities will seek to channel all traffic travelling through Gravesham on to the primary road network and to channel traffic between and within residential, industrial and principal business districts of the Borough onto the district distributors.

Policy T3

- 8.31 The Local Planning and Highway Authorities will not normally permit any proposed development that generates significant volumes of commercial vehicle traffic, if it is not well related to the primary and district distributor network.

Policy P3

- 8.32 The Borough Council will expect development to make provision for vehicle parking, in accordance with the Kent County Council Vehicle Parking Standards, as interpreted by Gravesham Borough Council, unless justified as an exception. All vehicle parking provision should normally be made on the development site. In the case of proposals for development in Class B1, as defined in the Town and Country Planning (Use Classes) Order 1987, the Borough Council will expect car parking provision to be made at the standard for offices and will also require lorry parking and manoeuvring areas to be provided, unless the applicant is willing to enter into an agreement to restrict the uses to which the permission relates.

The National Planning Policy Framework Revised July 2021

- 8.33 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.
- 8.34 The overarching principle which runs through the NPPF is the presumption in favour of sustainable development. At a very high level, the objective of sustainable development can be summarised as meeting the needs of the present without compromising the ability of future generations to meet their own needs.

- 8.35 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. 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.
- 8.36 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. Plans and decisions should apply a presumption in favour of sustainable development.

Decision Making

- 8.37 Local planning authorities should approach decisions on proposed development in a positive and creative way. They should use the full range of planning tools available, including brownfield registers and permission in principle, and work proactively with applicants to secure developments that will improve economic, social and environmental conditions of the area. Decision-makers at every level should seek to approve applications for sustainable development where possible.
- 8.38 Planning law requires that applications for planning permission be determined in accordance with the development plan, unless material considerations indicate otherwise. Decisions on applications should be made as quickly as possible, and within statutory timescales unless a longer period has been agreed by the applicant in writing.

Building a strong, competitive economy

- 8.39 Paragraph 81 states that planning policies and decisions should help create the conditions in which businesses can invest, expand and adapt. Significant weight should be placed on the need to support economic growth and productivity, taking into account both local business needs and wider opportunities for development. The approach taken should allow each area to build on its strengths, counter any weaknesses and address the challenges of the future. This is particularly important where Britain can be a global leader in driving innovation, and in areas with high levels of productivity, which should be able to capitalise on their performance and potential.

Promoting sustainable transport

- 8.40 Paragraph 111 states development should only be prevented or refused on highways grounds if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the road network would be severe.

Making effective use of land

- 8.41 Paragraph 124 recognises that Planning policies and decisions should support development that makes efficient use of land. This includes taking into account the need for the development and the availability of land suitable for accommodating it in addition to local market conditions and viability.

Meeting the challenge of climate change, flooding and coastal change

- 8.42 Paragraph 152 states the planning system should support the transition to a low carbon future in a changing climate, taking full account of flood risk and coastal change. It should help to: shape places in ways that contribute to radical reductions in greenhouse gas emissions, minimise vulnerability and improve resilience; encourage the reuse of existing resources, including the conversion of existing buildings; and support renewable and low carbon energy and associated infrastructure.

- 8.43 When determining any planning applications, local planning authorities should ensure that flood risk is not increased elsewhere. Where appropriate, applications should be supported by a site-specific flood-risk assessment. Development should only be allowed in areas at risk of flooding where, in the light of this assessment (and the sequential and exception tests, as applicable) it can be demonstrated that:

- a) within the site, the most vulnerable development is located in areas of lowest flood risk, unless there are overriding reasons to prefer a different location;
- b) the development is appropriately flood resistant and resilient such that, in the event of a flood, it could be quickly brought back into use without significant refurbishment;
- c) it incorporates sustainable drainage systems, unless there is clear evidence that this would be inappropriate;
- d) any residual risk can be safely managed; and
- e) safe access and escape routes are included where appropriate, as part of an agreed emergency plan.

- 8.44 Major developments should incorporate sustainable drainage systems unless there is clear evidence that this would be inappropriate. The systems used should:

- a) take account of advice from the lead local flood authority;
- b) have appropriate proposed minimum operational standards;
- c) have maintenance arrangements in place to ensure an acceptable standard of operation for the lifetime of the development; and
- d) where possible, provide multifunctional benefits.

Conserving and enhancing the natural environment

- 8.45 Paragraph 174 states planning decisions should contribute to and enhance the natural and local environment by:

- a) Protecting and enhancing valued landscapes, sites of biodiversity or geological value and soils (in a manner commensurate with their statutory status or identified quality in the development plan);

- b) Recognising the intrinsic character and beauty of the countryside, and the wider benefits from natural capital and ecosystem services – including the economic and other benefits of the best and most versatile agricultural land, and of trees and woodland;
- c) Maintaining the character of the undeveloped coast, while improving public access to it where appropriate;
- d) Minimising impacts on and providing net gains for biodiversity, including by establishing coherent ecological networks that are more resilient to current and future pressures;
- e) Preventing new and existing development from contributing to, being put at unacceptable risk from, or being adversely affected by, unacceptable levels of soil, air, water or noise pollution or land instability. Development should, wherever possible, help to improve local environmental conditions such as air and water quality, taking into account relevant information such as river basin management plans; and
- f) Remediating and mitigating despoiled, degraded, derelict, contaminated and unstable land, where appropriate.

8.46 Planning policies and decisions should also ensure that new development is appropriate for its location taking into account the likely effects (including cumulative effects) of pollution on health, living conditions and the natural environment, as well as the potential sensitivity of the site or the wider area to impacts that could arise from the development. In doing so they should:

- a) mitigate and reduce to a minimum potential adverse impacts resulting from noise from new development – and avoid noise giving rise to significant adverse impacts on health and the quality of life;
- b) identify and protect tranquil areas which have remained relatively undisturbed by noise and are prized for their recreational and amenity value for this reason; and
- c) limit the impact of light pollution from artificial light on local amenity, intrinsically dark landscapes and nature conservation.

8.47 Planning policies and decisions should sustain and contribute towards compliance with relevant limit values or national objectives for pollutants, taking into account the presence of Air Quality Management Areas and Clean Air Zones, and the cumulative impacts from individual sites in local areas. Opportunities to improve air quality or mitigate impacts should be identified, such as through traffic and travel management, and green infrastructure provision and enhancement.

8.48 The focus of planning policies and decisions should be on whether proposed development is an acceptable use of land, rather than the control of processes or emissions (where these are subject to separate pollution control regimes). Planning decisions should assume that these regimes will operate effectively. Equally, where a planning decision has been made on a particular development, the planning issues should not be revisited through the permitting regimes operated by pollution control authorities.

Conserving and enhancing the historic environment

8.49 Paragraph 194 states that in determining applications, local planning authorities should require an applicant to describe the significance of any heritage assets affected, including any contribution made by their setting. The level of detail should be proportionate to the assets' importance and no more than is sufficient to understand the potential impact of the proposal on their significance. As

a minimum the relevant historic environment record should have been consulted and the heritage assets assessed using appropriate expertise where necessary. Where a site on which development is proposed includes, or has the potential to include, heritage assets with archaeological interest, local planning authorities should require developers to submit an appropriate desk-based assessment and, where necessary, a field evaluation.

Planning Policy Summary

Principle of the Proposed Development

- 8.50 The Gravesham Local Plan Core Strategy (GLPCS) designates the Site within Policy CS03 as an opportunity area. This seeks to improve the area through regeneration, providing housing employment and environmental improvements. It is recognised that the Imperial Business Estate is expected to remain in employment use over the plan period. Within this policy it is recognised that the Council will support proposals for bringing Imperial Wharf back into a river based use that is appropriate to context.
- 8.51 The Proposed Development seeks to increase the resilience of the existing bitumen storage facilities at Imperial Wharf through the provision of additional bitumen storage capacity in addition to the erection of a bitumen emulsion plant. The proposal supports the Applicant's existing operations at the Site, safeguarding against supply chain issues and continuing to support the existing use of the wharf, through which bitumen is imported via shipping tankers using the River Thames. In this regard, the Proposed Development is in conformity with Policy CS03 of the GLPCS through the continued use of the wharf.
- 8.52 By continuing to invest in the existing facilities at Imperial Wharf the Applicant is also committed to supporting the local economy and the existing jobs at the facility. The operations at the Site support a multitude of different skilled personnel from those directly employed at the Site to those involved with the shipping of bitumen to the Site via the wharf. The Proposed Development is therefore considered to conform to policy CS07 of the GLPCS through the continued support of the local economy, employment and skills, particularly in respect of river-related employment.
- 8.53 Policy CS01 of the GLPCS relates to sustainable development with reference to the NPPF. One of the main drivers behind the Proposed Development is increased resilience. By increasing the capacity of the existing bitumen storage facilities through the provision of the additional bitumen storage tanks, the Applicant is able to safeguard against delays in shipment, ensuring a consistency of supply to their customers and wider operations which include a number of asphalt plants located throughout the southeast. Without the Proposed Development the Site would be at greater vulnerability to supply chain issues, which is particularly pertinent within the current global market in which supply chains are struggling in the post Covid-19 recovery as well as from the war in Ukraine. Furthermore, the new loading gantry provides resilience as an additional loading point for HGVs in addition to the existing facilities.
- 8.54 Through the use of the existing wharf the Proposed Development also maximises the use of sustainable transport as the import of bitumen via shipping tanker removes the need for a significant number of HGV movements through the transport of bitumen via road. This represents a significant carbon reduction when contrasted against the use of HGVs to transport the equivalent quantity of

bitumen into the region from elsewhere. In this regard, it is considered that the Proposed Development represents sustainable development in line with the NPPF.

Local Character, Landscape and Visual Impact

8.55 Careful consideration has been made to the design and location of the Proposed Development such as to integrate the development with its surrounds, minimising as far as reasonably possible any adverse impacts. Policy CS02 of the GLPCS seeks to promote regeneration and the redevelopment of underused derelict and previously developed land. The Proposed Development essentially comprises a redistribution of activities at the Site, making best use of the land at the Site whilst achieving the aim of increased resilience. By locating the two new bitumen tanks on the existing car parking area they are kept away from the more prominent river frontage which enables them to be better integrated into the existing built form of the area. In doing this, the car parking facilities are proposed to be relocated onto a previously underused parcel of land off Clifton Marine Parade.

- 8.56 Policy CS19 requires that new developments conserve the character of the local built, historic and natural environment and are well integrated into the surrounding local area. The Proposed Development has been subject to a Landscape and Visual Impact Assessment which has concluded that the Proposed Development will not result in any significant adverse impacts on either landscape or visual receptors including the two neighbouring conservation areas. **The Proposed Development therefore accords with Policies CS01 and CS02 of the GLPCS and national guidance.**

Transport

- 8.57 The Proposed Development will result in an average of 5 additional loads out per day on the local road network. This increase stems from forecast growth in bitumen demand, with additional asphalt plants to supply as well as the export of bitumen emulsion. This increase is not a significant level and can readily be accommodated within the local highway network. Policy CS11 of the GLPCS requires that new developments mitigate their impact on the highway and public transport networks as required. As appropriate, transport assessments and travel plans should be provided and implemented to ensure the delivery of travel choice and sustainable opportunities for travel.
- 8.58 A review of the local highway network has 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. An assessment of the parking need has been undertaken in accordance with local parking standards and proposed parking provision includes a significant margin for unforeseen circumstances, even if every member of staff travelled independently by car. The Applicant operates an effective Travel Plan which specifies targets for sustainable travel at the Site including the promotion of cycling through a cycle to work scheme which will be implemented in 2022 and a move towards electric company cars. **In this regard it is considered that with regard to transport the Proposed Development is in conformity with national policy and Policy CS11 of the GLPCS and Policies TC3, T1, T2, T3 and P3 of the Gravesham Local Plan First Review.**

Flood Risk and Drainage

- 8.59 Policy CS18 of the GLPCS requires that proposals in areas at risk of flooding must be accompanied by a Flood Risk Assessment (in accordance with national policy and Environment Agency standing guidance as appropriate) and a Flood Risk Management Plan (if required) to demonstrate that they are adequately defended and safe over their lifetime. In addition, the Council encourages the use of sustainable drainage systems on all developments where technically and financially feasible. An FRA has been undertaken by BCL Hydro which has assessed the vulnerability of the Proposed Development to flooding. The Site sits in an area which benefits from existing flood defences along the River Thames. Correspondence from the Environment Agency has identified that the existing defences require remedial works and a survey and any necessary repair works have been actioned by the Applicant. Correspondence from the Environment Agency also identifies the need to raise the flood defences in future. The Proposed Development will not impact the existing flood defences and will not impact their ability to be raised in future.
- 8.60 Subject to the implementation of appropriate drainage infrastructure as recommended by Ambiental, the Proposed Development will not increase flood risk and will be suitably resilient to flooding over its lifetime. **In this regard the Proposed Development accords with national policy and is consistent with Policy CS18 of the GLPCS.**

Contaminated Land

- 8.61 Policy CS19 of the GLPCS requires that new development avoids adverse environmental impacts from pollution, including noise, air, odour and light pollution, and land contamination and does not pose an unacceptable risk or harm to the water environment, including the quality and/or quantity of ground waters, surface waters, wetlands and coastal water systems. A ground condition desk top study has been undertaken by Ground Condition Consultants on behalf of the Applicant in support of the Proposed Development. The study identifies that the industrial setting of the Site and historic uses do present the risk of historical land contamination. However, the risk of impact to identified receptors from the identified potential sources is generally considered to be very low to low/moderate. Given the low sensitivity of the proposed use and the likely predominance of hard standing in the completed development, the risks to the health of the futures users are considered to be very low. **In this regard it is considered that the Proposed Development conforms to Policy CS19 of the GLPCS and national guidance.**

Ecology and Biodiversity

- 8.62 Policy CS12 of the GLPCS states that sites designated for their biodiversity value will be protected, with the highest level of protection given to internationally designated Special Protection Areas, Special Areas of Conservation and Ramsar sites, followed by nationally designated Sites of Special Scientific Interest, followed by Local Wildlife Sites and then by other areas of more local importance for biodiversity. The policy also states that there will be no net loss of biodiversity within the borough. Paragraph 174 of the NPPF also states that planning decisions should contribute to and enhance the natural and local environment.
- 8.63 There are no sites designated for their International nature conservation value within 1 kilometre of the Site; however, there is one site within the extended 5 kilometres zone of influence (Zol) for Internationally designated sites. There are no Sites of Special Scientific Interest (SSSIs) or other sites of National importance within the 1 kilometre Zol. There are no non-statutory sites of County

or Local importance within the 1 kilometre ZOI. The Site and the Proposed Development have been assessed as part of a Preliminary Ecological Appraisal and it is considered that the Proposed Development will not have any significant adverse impacts on valued ecological resources. **In this regard it is considered, therefore, that the Proposed Development conforms to national guidance and Policy CS12 of the GLPCS.**

Cultural Heritage

- 8.64 Careful consideration has been made to the design and location of the Proposed Development such as to integrate the development within its surrounds, minimising as far as reasonably possible any adverse impacts. Policy CS20 of the GLPCS states that the Council will accord a high priority towards the preservation, protection and enhancement of its heritage and historic environment as a non-renewable resource, central to the regeneration of the area and the reinforcement of sense of place. By locating the two new bitumen tanks on the existing car parking area they are kept away from the more prominent river frontage which enables them to be better integrated into the existing built form of the area. This, combined with the choice of colour of the bitumen storage tanks and emulsion plant tanks reduces any adverse impacts upon the setting of the Lansdowne Square Conservation Area and the Overcliffe Conservation Area.
- 8.65 Paragraph 194 of the NPPF states that local authorities should require applicants to consider the significance of any heritage assets affected. A Cultural Heritage Assessment has been undertaken by Andrew Josephs Associates in respect of the Proposed Development. There are no views from the core of the Lansdowne Square Conservation Area to the Site at ground level. Although visible from upper floor windows on the rear elevations of Pier Road, the proposed tanks would blend in with the industrial landscape, and the form and mass of the existing tanks and commercial development adjacent. There would be no views at ground level of the Proposed Development from the villas on Overcliffe, nor any other publicly accessible part of the Conservation Area due to tree screening along Overcliffe. **It is therefore considered that the Proposed Development is in conformity with national guidance and Policy CS20 of the GLPCS.**

Noise and Air Quality

- 8.66 Policy CS19 requires that new development should be located, designed and constructed to avoid adverse environmental impacts from pollution, including noise, air, odour and light pollution, and land contamination. This is also enshrined within the NPPF. A Noise Assessment undertaken by WBM Limited in support of the Proposed Development considered the existing background noise environment at the Site and compared it to modelled noise from the new developments. The assessment concluded that there will be no adverse impacts from a noise perspective and noise levels will remain within currently permitted levels.
- 8.67 An Air Quality and Odour Assessment undertaken by Tetra Tech has considered the existing Site conditions against the Proposed Development. Modelling undertaken demonstrates that the odour effects from the Site operations on the sensitive receptors will be insignificant and the Proposed Development is not considered to be contrary to any local or national planning policies with respect to air quality or odour. **It is therefore considered that the Proposed Development conforms to national guidance and Policy CS19 of the GLPCS in respect of noise and air quality matters.**

Conclusions with regard to Planning Policy

- 8.68 Section 38(6) of the Planning and Compulsory Purchase Act 2004 requires the Council to determine any application in accordance with the statutory development plan unless material considerations indicate otherwise.
- 8.69 The material considerations of the Proposed Development have been assessed against the relevant policies. It is concluded that the Proposed Development, taken overall, accords with the relevant development plan policies. There are no material planning considerations which justify the refusal to grant planning permission.
- 8.70 The Proposed Development is consistent with relevant planning policies and appropriate mitigation measures are already in place to ensure that any environmental impacts are properly controlled. In these circumstances the development is in accordance with the development plan and NPPF.
- 8.71 It is, therefore, proposed that the development accords with relevant adopted development plan policy, and in accordance with the NPPF there should be a presumption in favour of granting planning permission for this sustainable development.

9. CONCLUSIONS

- 9.1 This planning application has been submitted to GBC to allow 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.
- 9.2 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. This need to increase resilience is particularly pertinent in the current global climate with supply chains struggling to keep up with demand post-Covid, leading to widespread delays in the supply of goods and products.
- 9.3 The new bitumen emulsion plant and load out gantry will complement the Applicant's existing established operations at the Site as well as their wider established operations within the region providing continued employment opportunities and economic investment to the area.
- 9.4 All relevant environmental considerations have been taken into account and the proposals have been considered against applicable planning policy at all levels. On this basis it is considered that the proposal is in accordance with planning policy and will not have any adverse impact upon neighbouring amenity or the local environment.
- 9.5 Consequently, in light of the above, it is considered that there are no overriding reasons to restrict the grant of planning permission.

DRAWINGS

Drawing Number KD.IMP.D.001	Location Plan	Scale 1:25,000 @A3
Drawing Number KD.IMP.D.003	Current Situation/ Immediate Site Context	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 1:250 @A3
Drawing Number KD.IMP.D.010	Emulsion Plant & Tanks	Scale varies @A3
Drawing Number KD.IMP.D.011	Truck Loading System	Scale 1:50 @A3

APPENDICES

Appendix 1 – Screening Opinion issued by Gravesham Borough Council dated 20 December 2021

Gravesham Borough Council

Appendix 2 – Landscape and Visual Impact Assessment produced by Kedd Limited

Gravesend Borough Council

Appendix 3 – Transport Statement produced by The Hurlstone Partnership

Gravesend Borough Council

Appendix 4 – Flood Risk Assessment produced by BCL Hydro & Surface Water Drainage Strategy produced by Ambiental

Gravesend Borough Council

Appendix 5 – Ground Condition Desktop Study produced by Ground Condition Consultants Limited

Gravesend Borough Council

Appendix 6 – Preliminary Ecological Appraisal produced by Wilkinson Associates

Gravesend Borough Council

Appendix 7 – Cultural Heritage Assessment produced by Andrew Josephs Associates

Gravesend Borough Council

Appendix 8 – Noise Assessment produced by WBM Limited

Gravesend Borough Council

Appendix 9 – Air Quality and Odour Assessment produced by Tetra Tech Limited

Gravesend Borough Council