

Our Ref: 20/010/GM/23/019

Your Ref: 20220733

Planning and Regeneration
Gravesham Borough Council
Civic Centre
Gravesend
Kent
DA12 1AU

For the attention of Mr E Bonthron



28 April 2023

Dear Ethan,

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Planning Application Reference 20220733 – Land at Imperial Wharf, Clifton Marine Parade, Gravesend, Kent, DA11 0DY

Following our telephone discussion of 13 April 2022 in respect of the above I understand that Gravesham Borough Council (GBC) require further clarification in respect of odour emissions at the Site. Specifically, you queried whether it was possible to impose any ongoing monitoring of odour emissions at the Site in order to ensure that they remain within acceptable levels once the proposed development becomes fully operational.

We are aware that a number of complaints were received in 2018 from local residents concerning odour from Site operations. It was noted that issues typically occurred when ships were offloading at the facility and when the wind was blowing towards Overcliffe.

Following receipt of these complaints FM Conway promptly undertook investigations at the Site in order to identify the deficiencies in their odour control systems. This work culminated in the installation of new carbon filters in addition to the adoption of an Odour Management Plan which outlines procedures for reducing odour emissions and monitoring to be undertaken by Site operatives in order to ensure that any odour emissions remain within acceptable limits. This action has ensured that odour at the Site is minimised and the efficacy of this has been demonstrated through the absence of odour complaints since the end of 2018.

In respect of the proposed development, odour modelling has been undertaken by Tetra Tech which has demonstrated that the proposals will be acceptable from an odour perspective and will accord with Environment Agency Guidance H4 Odour Management (March 2011). This assessment, together with further information provided within a technical note produced by Tetra Tech, dated 12 December 2022, has been reviewed by GBC's Environmental Protection Officer who has agreed with the conclusions drawn, enabling them to remove their initial objection to the development.

In terms of the proposed development, whilst it is an expansion of the existing bitumen storage facility, the work is essential to ensure the Site's resilience, rather than to enable an increase in trading levels. Therefore, whilst there will be more bitumen stored at the facility, this will not actually culminate in an increase in the frequency of bitumen deliveries via ship which is known to be a source of odour emissions. Typically, odour emissions from this type of facility occur when air is displaced, this can be either through the filling of the



storage tanks during deliveries, or through the loading of HGV tankers. When the facility is static, i.e. it is holding bitumen but no loading or unloading operations are taking place, then emissions are negligible as no air is being displaced. It is natural to conclude, therefore, that although the proposed development will be an expansion of the existing facility, there is unlikely to be any noticeable increase in odour when compared against the existing situation.

Nevertheless, we understand that there is a need to control operations at the Site in order to ensure that there is no repeat of the historical odour issues in future. Having discussed with our client and our air quality consultants Tetra Tech, we suggest that the best way of doing this would be through the imposition of an appropriate planning condition.

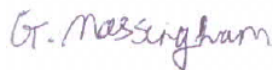
With regard to odour, the most effective method of monitoring is through the use of olfactory surveys undertaken by a qualified expert. Attached to this letter is a survey methodology proposed by Tetra Tech for the Site. In terms of an appropriate planning condition, we would suggest the following:

"Within three months of the completion of the development an odour survey should be undertaken in accordance with the methodology outlined within the Odour Survey Plan produced by Tetra Tech, dated 28 April 2023, and should be submitted to Gravesham Borough Council for approval. The assessment should be undertaken under conditions representative of the worst-case scenario. Should any issues be identified during the assessment, then the Operator will undertake appropriate investigation and any remedial actions intended to be undertaken should be outlined in writing to Gravesham Borough Council. The odour survey should be repeated in the event of any future justified odour complaints."

Through the imposition of the condition above, GBC will be able to monitor the odour at the Site once the development becomes fully operational. The findings of the initial survey will determine whether any additional odour mitigation needs to be considered and if so, this should be discussed with GBC. Beyond the initial odour survey, FM Conway are fully committed to ensuring that the facility operates to the highest standards and commit to undertake future surveys and reporting to GBC should a justified complaint be received.

I trust that this letter clarifies matters in respect of odour and provides an appropriate scheme of future monitoring to ensure that odour is maintained within environmentally acceptable limits, preserving local amenity. Should you have any questions or wish to discuss further, please do not hesitate to contact me.

Yours sincerely,



George Massingham BSc (Hons) AssocRTPI
CONSULTANT

784-B029584

28th April 2023

A field odour survey (sniff test) will be undertaken around the Imperial Wharf Conway site and surrounding areas. The survey will be undertaken by surveyors with documented olfactory acuity and following the Environment Agency's protocol for testing ("sniff testing") as described in Section 5 of the Guidance Note of *"H4 Odour Management, How to comply with your environmental permit"* (March 2011). The odour survey will also follow the *"Guidance on the assessment of odour for planning"* published by The Institute of Air Quality Management (IAQM) in July 2018.

The odour surveys will be undertaken along transects from the proposed development to assess odour levels at sensitive receptor locations. The odour surveys will be ideally undertaken under worst-case meteorological conditions during periods with a north-easterly wind. It is during these conditions that the highly sensitive residential receptors situated along Pier Road, Burch Road, Maclure Road and Hillier Crescent are likely to be impacted by odour from the proposed development. The odour surveys will also be planned to ideally coincide with the deliveries of bitumen, (when odour from the site is likely to be strongest), where possible.

Figure 1 below shows the proposed odour sniffing locations.

