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Environmental Impact Assessment (EIA) Screening Request

Blackthorne Farm, Culverstone Green, Meopham,
Gravesham

Iceni Projects Limited on
behalf of Esquire
Developments

March 2025

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ICENI PROJECTS LIMITED
ON BEHALF OF ESQUIRE
DEVELOPMENTS

Environmental Impact Assessment
(EIA) Screening Request
BLACKTHORNE FARM, CULVERSTONE GREEN,
MEOPHAM, GRAVESHAM

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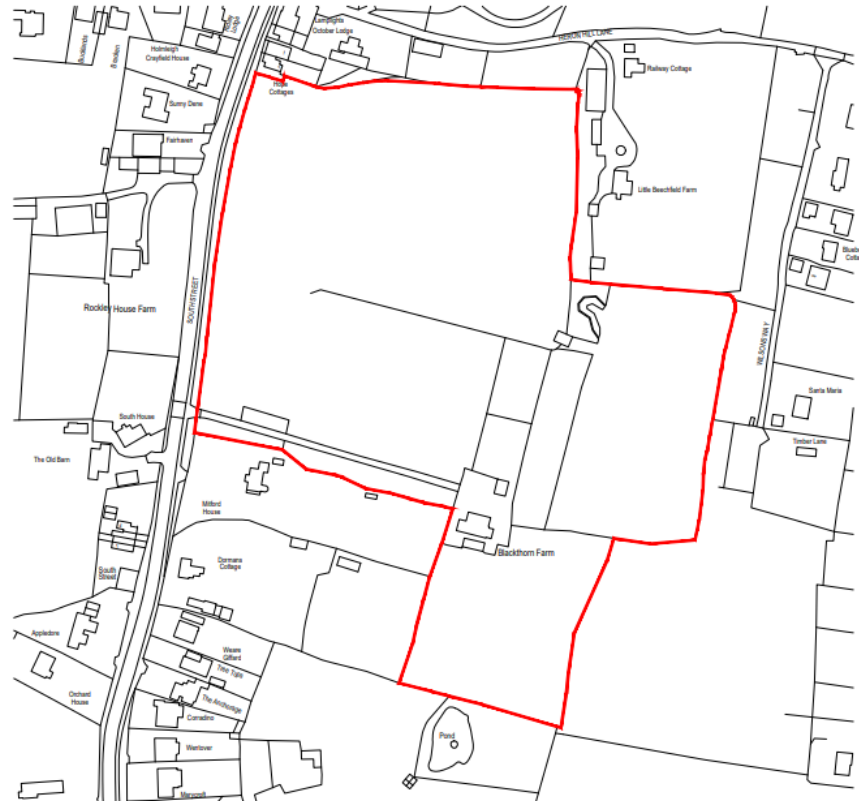
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1. INTRODUCTION

- 1.1 This report has been prepared by Iceni Projects Limited (hereafter referred to as 'Iceni') on behalf of Esquire Developments (the 'Applicant') as part of a request to Gravesham Borough Council ('GBC') to adopt an Environmental Impact Assessment ('EIA') Screening Opinion in respect of the development proposal at Blackthorne Farm, Culverstone Green, Meopham (the 'Site').
- 1.2 The Applicant intends to submit a planning application for the redevelopment of the Site to provide a residential development (the 'Proposed Development'). A Site Location Plan is included at **Figure 1.1.** and **Appendix A1.**
- 1.3 This request has been prepared in accordance with Regulation 6 of *The Town and Country Planning (Environmental Impact Assessment) Regulations 2017* (as amended)¹ (the 'EIA Regulations'). In line with Regulation 6(2), this Screening Request provides the following information:-
- A plan sufficient to identify the land (**Figure 1.1** and **Appendix A1**);
 - A description of the Site and surroundings, and an identification of the environmental sensitivity of the areas likely to be affected (**Section 2**);
 - A description of the Proposed Development including its physical characteristics (**Section 3**);
 - Where applicable, a description of any likely significant environmental effects and any measures envisaged to avoid or prevent adverse effects (**Section 4**); and
 - A summary of the findings where the development sits in relation to the EIA Regulations (**Section 5**).
- 1.4 The following sections provide sufficient information for GBC to reach a conclusion on the potential for significant effects as a result of the Proposed Development and issue a Screening Opinion. In addition, the planning application will be supported by a wide range of supplementary documents addressing the potential impacts of the Proposed Development (see **Appendix A2**).

¹ Her Majesty's Stationery Office, (2018); *The Town and Country Planning (Environmental Impact Assessment) Regulations 2017* (as amended by the *Town and Country Planning and Infrastructure Planning (Environmental Impact Assessment) (Amendment) Regulations 2018*))

Figure 1.1. Site Location Plan



2. DESCRIPTION OF THE SITE AND SURROUNDINGS

Site Description and Context

- 2.1 The Site extends to approximately 5.5 hectares ('ha') in size. The Site is located to the north of the residential area of Culverstone Green, Meopham. To the north, the Site is bound by small commercial premises along Heron Hill Lane, whilst the south is bound by a country track that appears to provide access to Blackthorn Farm. Beechfield Cottages and Wilsons Way sit to the east of the Site, whilst South Street binds the west of the Site, along which several detached residential properties are located.
- 2.2 From a review of online mapping, the Site predominantly comprises land currently in agricultural (pastoral) use. Field boundaries are demarcated by trees and shrubs.
- 2.3 The environmental constraints to the Site are shown in **Figure 2.1**.
- 2.4 An indicative list of documents to be submitted as part of the wider planning application is included at **Appendix A2**, which will be referenced throughout the screening assessment where relevant.

Transport and Connectivity

- 2.5 The Site is accessible from the local road network, and pedestrian and vehicle access to the Site is taken via South Street.
- 2.6 The nearest option for public transport are the 'Ridley Turning' bus stops adjacent to the northern boundary on South Street, which offer regular services on the 308, 418R, 418W, 223, 305, 306 and VIGO1 routes to Sevenoaks, Vigo Village, Weald of Kent School, Wrotham, Gravesend, New Ash Green and Denton.
- 2.7 The closest train station to the Site is located approximately 4.36 km north of the Site, in Meopham, and offers frequent southeastern services to London and the south east coast.

Historic Environment

- 2.8 There are no listed buildings within the Site boundary. The nearest listed buildings are Owls Castle (Grade II) and Owls Castle Barn (Grade II), located approximately 0.19km south west of the Site, and Ivy House (Grade II), located approximately 400m north of the Site.
- 2.9 The Site is not located within, or in proximity to, a Conservation Area, the closest of which is the Hodsoll Street Conservation Area, which sits approximately 0.98km to the south west of the Site in Ridley Village, Sevenoaks.
- 2.10 There are no archaeological designations present within, or in proximity to, the Site. The nearest Scheduled Monument is 'Coldrum Megalithic Tomb, Trottisciffe' located approximately 3.1km south east of the Site.

Water Environment and Flood Risk

- 2.11 The Environment Agency's Flood Mapping indicates that the Site is located within Flood Zone 1, and therefore has a low probability of flooding from rivers and the sea. Flood risk from groundwater and reservoirs are considered to be low.
- 2.12 The Site is not at risk of surface water flooding. The Site lies within Groundwater Source Protection Zone (SPZ) 3.

Air Quality

- 2.13 The Site is not located within, or adjacent to, an Air Quality Management Area ('AQMA'). The nearest AQMA is the Tonbridge and Malling Borough Council AQMA No 7 Borough Green, located approximately 6.6km south west was designated for exceedances of the Annual Mean for NO₂.
- 2.14 The latest Air Quality Annual Status Report for GBC² finds that road traffic is the dominant source of air pollution, particularly along major highway routes; however, currently there are no areas in the Borough where members of the public are exposed to concentrations of these pollutants in excess of the UK Air Quality Strategy (AQS) Objectives.
- 2.15 An Air Quality Assessment is proposed for submission with the planning application.

Ecological Designations

- 2.16 The Site is not subject to any ecological designations and there are none within the immediate proximity of the Site.
- 2.17 The nearest designations to the Site are Halling to Trottiscliffe Escarpment Site of Special Scientific Interest (SSSI), located approximately 2.23km south of the Site.
- 2.18 The nearest European designation is Thames Estuary and Marshes Special Protection Area (SPA), located approximately 15.78km north east of the Site.
- 2.19 Numerous parcels of Ancient Woodland are present in the vicinity of the Site, with the closest parcel located immediately east of the Site.

Ground Conditions

- 2.20 The Site is underlain by Lewes Nodular Chalk Formation, Seaford Chalk Formation and Newhaven Chalk Formation at bedrock, with sedimentary deposits of Clay-with-flints Formation. A principal aquifer underlies the Site at bedrock. Groundwater vulnerability at the Site ranges from 'Medium to 'Medium – High'.
- 2.21

² GBC (2024) Air Quality Annual Status Report. Available at <<https://www.kentair.org.uk/report/gravesham-borough-council-annual-status-report-2024>>

Agricultural Land

- 2.22 In regards to Agricultural Land Classification (ALC), soils are graded by their quality where Grade 1 is Best and Most Versatile (BMV) Agricultural Land and Grade 5 is poorest quality. Online reporting (Natural England's Provisional Agricultural Land Classification) demonstrates that the ALC across the Site is Grade 3, which is considered to be good to moderate quality agricultural land. This designation for Grade 3 also extends across the developed area of Culverstone Green.

Landscape

- 2.23 The existing land use at the Site is agricultural, and is bordered by residential properties, trees and hedgerows. The Site lies within the Green Belt.
- 2.24 The Site is not covered by any national, regional or local landscape designations. The nearest nationally designated landscape is the Kent Downs National Landscape, located approximately 1.36km to the east of the Site, at its nearest point.
- 2.25 A preliminary Landscape and Visual Appraisal (**Appendix A3**), previously undertaken for the Site in 2018, finds that the majority of the Site lies within National Character Area (NCA) Profile 119: North Downs. The North Downs are a chain of chalk hills which extend from the Hog's Back in Surrey and end at the White Cliffs of Dover. The North Downs support arable cropping, which is the dominant land use within the NCA. The Landscape and Visual Appraisal finds that the Site is of low landscape value. This is in light of fact that the Site is:
- Not of noteworthy scenic beauty, insofar that it largely comprises a series of commonplace fields with ruderal vegetation, contained by woodland and tree vegetation;
 - Not particularly remote, given its proximity to existing built development and the highway network;
 - Not part of an historic landscape setting to a noted heritage asset;
 - Not currently affording the opportunity for public recreation; and
 - Not covered by any landscape designations.

Figure 2.1 Environmental Sensitivities Map



3. PROPOSED DEVELOPMENT

- 3.1 The Applicant intends to submit an outline planning application, with all matters reserved except for access. An Indicative Layout is shown at Figure 3.1, but note this is subject to change and assessment is undertaken on a worst-case basis.
- 3.2 The Proposed Development will provide up to 100 homes of up to two storeys in height.
- 3.3 The Proposed Development will be accessed via South Street. The Proposed Development will provide car parking spaces in line with GBC policy requirements.
- 3.4 The Proposed Development will retain existing vegetation, where possible, and provide new planting and landscaped areas.
- 3.5 The Proposed Development will provide an area of public open space in the eastern section of the Site, adjacent to the Ancient Woodland.
- 3.6 It is expected that, subject to planning permission, construction will commence at the Site in 2026, and the Proposed Development will be fully operational by 2029.

Mitigation

- 3.7 In accordance with Regulation 6(2)(e) of the EIA Regulations, a number of mitigation measures have been committed to at screening stage as part of the Proposed Development, as follows:
- A Construction Environmental Management Plan (CEMP) will be implemented in order to mitigate the potential human and environmental health effects of the construction and decommissioning phases, respectively. This will be secured through a suitably worded planning condition;
 - A Construction Traffic Management Plan (CTMP) will be implemented to mitigate the potential effects of the introduction of construction traffic. This will be secured through the CEMP or through a suitably worded planning condition;
 - The built development will be of a low height, up to a maximum of two storeys, in order to reduce the potential visual impacts of the Proposed Development and to ensure it is sensitive to the low-rise development to the north, the setting of surrounding designated heritage assets, and the surrounding countryside;
 - Landscaping and hedgerows will also be planted during the construction phase to soften the new built form, and integrate the Proposed Development into the surrounding area once operational. The Site borders a residential area, and the Proposed Development is residential-led scheme, therefore the final chosen embedded mitigation landscape and visual effects will be sensitive to this type of development;
 - All dwellings provided by the Proposed Development will be built with a 'fabric first' approach. Each dwelling will have an Air Source Heat Pump (ASHP) and an EV charging point, as standard;

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- Public open space and green infrastructure will be implemented within the eastern portion of the Site abutting Ancient Woodland to provide a buffer between this and built development of a minimum of 15m;T; and
 - Once operational, a Travel Plan will be implemented including measures and targets to promote sustainable and active travel by residents and reduce transport movements and subsequently, reduce emissions.

Figure 3.1 Indicative Layout



4. EIA SCREENING ASSESSMENT

- 4.1 In order to determine whether the Proposed Development is likely to be considered EIA development and require an EIA to be undertaken, regard must be given to the 'EIA Regulations'.
- 4.2 Regulation 2 defines EIA development as either:
- **Schedule 1 Development** – where EIA is mandatory and includes major projects such as nuclear power stations, chemical installations, motorways, railway lines and ports; or
 - **Schedule 2 Development** – a project/ proposal likely to have significant effects on the environment by virtue of factors such as its nature, size or location.
- 4.3 'Schedule 1 Development' is one that falls under Schedule 1 of the EIA Regulations and includes those developments which have a clear potential for significant environmental effects, such as crude oil refineries and thermal and nuclear power stations. Proposals for Schedule 1 development must be accompanied by an EIA.
- 4.4 The Proposed Development does not fall within Schedule 1 of the EIA Regulations.
- 4.5 'Schedule 2 Development' is defined as development of a description mentioned in Column 1 of the table in Schedule 2 where:
- It is located wholly or partly in a sensitive area (defined in Regulation 2 as including SSSIs, National Parks, AONBs, Scheduled Monuments, World Heritage Sites and European Sites); or
 - Any applicable threshold or criterion as set out in Column 2 of Schedule 2 is respectively **exceeded** or **met** in relation to the Proposed Development.
- 4.6 The Site is not located within a "sensitive area" as defined in Regulation 2(1) of the EIA Regulations, however, due to the nature of development and its size, the Proposed Development is considered a Schedule 2 development. The Proposed Development falls within Schedule 2 of the EIA Regulations, category 10 'Infrastructure Projects', sub-section (b) '*Urban development projects*'. The thresholds for such developments that could require an EIA are as follows:
- "(i) The development includes more than 1 hectare of urban development which is not dwellinghouse development; or*
- (ii) the development includes more than 150 dwellings; or*
- (iii) the overall area of the development exceeds 5 hectares."*
- 4.7 The Proposed Development exceeds threshold (ii) as the overall area of the Proposed Development just exceeds 5ha, as the Site is 5.5ha. As such, the Proposed Development is a Schedule 2 development.
- 4.8 Schemes which fall under Schedule 2 of the EIA Regulations are only considered to be 'EIA Development' where there is the potential to give rise to likely significant effects on the environment by factors such as their nature, size and location. This report details the environmental context of the

Site and assesses whether the Proposed Development would trigger likely significant environmental effects.

- 4.9 However, not all Schedule 2 developments constitute EIA development and the National Planning Practice Guidance (PPG) (having replaced Circular 02/99 (EIA)) contains specific guidance on the EIA Regulations. At paragraph 002 (Reference ID:4-002-20140306) of the NPPG³, it states that EIA should not be a barrier to growth and will only apply to a small proportion of projects considered within the town and country planning regime and Local Planning Authorities and developers should carefully consider if a project should be subject to an EIA. It states that only a very small proportion of Schedule 2 development will require an EIA (Reference ID: 4-018-20170728).
- 4.10 The PPG is clear that the focus should be on those effects which are significant. It provides as an Annex a series of Indicative Screening Thresholds which includes indicative criteria to assist in determining whether significant effects are likely, recognising that the location and sensitivity of an asset are important considerations.
- 4.11 The PPG states that an EIA is likely to be required for the development of sites which have not previously been intensively developed, if the area of the scheme is more than 5 hectares or if a development would have significant urbanising effects in a previously non-urbanised area (e.g. a new development of more than 1,000 dwellings).
- 4.12 Although the Site has not been intensively developed and the Site area extends to 5.5ha, the Proposed Development only seeks to provide up to 100 dwellings, which is significantly fewer than the 1,000 dwellings stated. The Proposed Development would also be situated on a parcel of land that would act as a natural extension to Culverstone Green. Moreover, the Site only exceeds the screening threshold by 0.5ha, which is not a significant increase upon the thresholds. The accompanying technical reports listed in **Appendix A2** will inform the design of the Proposed Development, which will, in turn, ensure that any potential significant effects can be mitigated.
- 4.13 In determining whether a development should be subject to an EIA, LPAs must take into account the relevant 'Selection Criteria' identified in Schedule 3 of the EIA Regulations. It identifies three broad criteria which should be considered, namely:
1. Characteristics of the development (such as size, cumulative effects, use of natural resources, production of waste, pollution and nuisances, risk of accidents and risk to human health);
 2. Location of the development (by reference to the environmental sensitivity of the area); and

³ Ministry of Housing, Communities and Local Government, (2019); Guidance: Environmental Impact Assessment. Available at: <https://www.gov.uk/guidance/environmental-impact-assessment>

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3. Characteristics of the potential impact (having regard to the extent and magnitude of the impact, its transfrontier nature, intensity and complexity, probability duration, frequency and reversibility and the possibility of effectively reducing the impact).

4.14 The Proposed Development is assessed against these criteria, as follows:

Characteristics of Development

Description of Impact		Potential for significant effects
(a) The size and design of development	The design of the Proposed Development will be informed by environmental studies in order to avoid or prevent significant adverse environmental effects. The design of the Proposed Development will ensure that it responds sensitively to its surroundings to avoid significant adverse visual effects, and it will be in-keeping with the local context of the Site (residential) whilst remaining cognisant of the existing landscape setting and the setting of local heritage assets. The potential effects of the scale of the Proposed Development will be mitigated as far as practicable through sensitive design, and are reviewed further in the following sections through the review of potential operational effects.	With mitigation informing the design of the Proposed Development, no significant effects are anticipated.
(b) Cumulation with other existing development and / or approved development	The PPG states that there are occasions where other existing or approved development may be relevant in determining whether significant effects are as a consequence of a proposed development. A search has been undertaken based on the proximity of 'approved' and 'under construction' planning applications to the Site (approximately a 1km radius), and potential scale and massing in consideration of townscape and views (which cover the greatest spatial extent for potential cumulative effects), beyond which material cumulative effects are not considered to occur. No such cumulative schemes have been identified, therefore significant effects are not anticipated.	

(c) The use of natural resources (particularly land, soil, water and biodiversity)	Approximately half of the Site comprises an ALC of Grade 3, which is considered to be good to moderate quality agricultural land. The other half of the Site comprises non-agricultural land. In the case of loss of agricultural land, a loss of less than 20ha of Grades 1, 2 or 3a is typically not considered significant and in need of consultation with Natural England; therefore, a significant effect to the availability of BMV agricultural land is not anticipated when comparing the Site area and its ALC composition. The construction of the Proposed Development would require the use of a range of natural and man-made construction materials. The Proposed Development will not utilise any important, high quality or scarce resources and will seek to use locally and sustainably sourced materials, as far as practicable. It is expected that the consumption of energy, water and other natural resources during the operation of the Proposed Development will be in line with other surrounding uses. It is not expected to result in significant energy usage or water intensive activities and will be managed effectively through design and consultation with statutory utility providers to avoid any adverse impacts on their capacity to provide services. Therefore, it is considered unlikely that the Proposed Development will result in significant effects relating to use of natural resources.	The Proposed Development will not give rise to significant effects.
(d) The production of waste	As with any development project, there is likely to be waste generated through the construction phase (such as waste from surplus construction materials and from excavation). Construction waste will be reused and recycled on-Site where possible and the waste to be exposed of externally to the Site will be managed through implementation of the CEMP to ensure it is disposed of at the appropriate facility, and is removed from the Site in a manner which does not generate excess transport movements, dust or odour.	The Proposed Development will not give rise to significant effects.

	The operational Proposed Development would give rise to household waste streams, which are not anticipated to be hazardous, and be managed through the implementation of best practice site management processes. Waste and recycling storage volumes would accord with relevant requirements of GBC. It is unlikely that operation of the Proposed Development would give rise to hazardous waste, particularly regarding the scale and nature of the Proposed Development. As such, the Proposed Development is not likely to give rise to significant effects in relation to the production of waste.	
(e) Pollution and nuisances	During the construction of the Proposed Development, dust from construction works and emissions from construction vehicles are likely to be generated, which may lead to some indirect and localised temporary effects such as disruption on the local road network for other road users, dust, noise and emission of pollutants. These impacts will be managed in accordance with best practice measures, which will be set out in a CEMP and CTMP to be adhered to by the contractors delivering the project. Following mitigation, these effects are unlikely to be significant and are discussed further in the traffic, noise and vibration and air quality sections. Therefore, it is not anticipated that the environmental effects will be significant. The operational Proposed Development would not generate any significant level of environmental pollution or nuisance, and the intended use of the Proposed Development is similar to the existing nearby residential development in Culverstone Green. Consequently, there is no likelihood of significant pollution or nuisance impacts arising from the Proposed Development during the operational phase that would require an EIA to be undertaken.	The Proposed Development will not give rise to significant effects.

(f) The risk of major accidents and/r disasters (including climate change)	During the construction phase, the contractor(s) will be obliged to implement measures in accordance with Health and Safety legislation/ requirements, and best practice to minimise the risks of accidents that could have adverse effects on people or the environment; all such measures will be incorporated into the CEMP. There are no anticipated significant risks of accidents during operation, as the Proposed Development will not involve the use of hazardous substances or operations. Therefore, the risk of major accidents or disasters is not considered to be significant. In addition, it is not considered that the Proposed Development will result in significant effects related to or from climate change.	The Proposed Development will not give rise to significant effects.
(g) The risks to human health	As discussed above, the construction works and the operational Proposed Development would not be likely to lead to significant effects on human health with regard to noise, air quality, contamination or flood risk. The Applicant has an obligation to follow relevant health and safety legislation in order to ensure those working on the Site are protected, and to ensure the protection of others who may be affected by the Proposed Development, e.g. those living, passing or working nearby, or visitors to the Site. Moreover, construction measures, as set out in the CEMP, will be followed to ensure there are no leaks or spillages on the Site itself, or within the surrounding area.	The Proposed Development will not give rise to significant effects.

Summary

- 4.15 As set out above, the characteristics of the Proposed Development are not expected to give rise to significant effects.

Location of Development

(a) The existing and approved land use

- 4.16 The Site currently comprises agricultural land. The Site sits within the wider context of residential development to the north, east, south and west. The Proposed Development would therefore be in line with the land uses local to the Site.

(b) The relative abundance, availability, quality and regenerative capacity of natural resources in the area (including soil, land, water and biodiversity) and its underground

- 4.17 The Proposed Development is unlikely to have significant effects in the abundance, availability and regenerative capacity of natural resources for the reasons set out below.

(c) The absorption capacity of the natural environment, paying particular attention to the following areas:

(i) wetlands, riparian areas, river mouths;	The Site is not within proximity of any water resources, such as rivers, lakes or coastal waters, nor are there any within the Site, therefore this consideration is not applicable.
(ii) coastal zones and the marine environment;	The Site is not within proximity of any water resources, such as rivers, lakes or coastal waters, nor are there any within the Site, therefore this consideration is not applicable.
(iii) mountain and forest areas;	The Site is not located within mountain or forest areas, therefore this is not applicable.
(iv) nature reserves and parks;	This is not applicable as the Site is not located within, or in proximity to a designated Local Nature Reserve, National Nature Reserve or National Park.
(v) European sites and other areas classified or protected under national legislation;	The nearest European designation is Thames Estuary and Marshes SPA, located approximately 15.78km north east of the Site. Significant effects to the designation are not expected due to intervening distance and built development in Gravesend.

(vi) areas in which there has already been a failure to meet the environmental quality standards, laid down in European Union legislation and relevant to the project, or in which it is considered that there is such a failure;	This Site is not located within, or in proximity to, an AQMA and local reporting identifies that AQS are not exceeded.
(vii) densely populated areas;	This Site is located on the north western fringe of Culverstone Green, which is not located within a densely populated area, therefore this is not applicable.
(viii) landscapes and sites of historical, cultural or archaeological significance.	The Site is not located within a conservation area. There are three listed buildings within proximity of the Site. Due to the intervening residential development between the Site and the heritage assets, it is considered that the Proposed Development will not give rise to significant effects on the listed buildings. The Site is not subject to statutory landscape designations, however the Site lies within NCA Profile 119: North Downs. The preliminary Landscape Appraisal undertaken for the Site, finds the Site to be of low landscape value.

Summary

- 4.18 The Site is not located in proximity to wetlands, riparian areas and river mouths, coastal zones and the marine environment and European sites and other areas classified or protected under national legislation. Therefore, detailed environmental assessments will be undertaken in accordance with appropriate guidance and submitted as part of the planning application as standalone supporting planning documents.
- 4.19 Further assessment work will inform the appropriate additional mitigation measures required to ensure there are no significant effects that may result from the construction and operation of the Proposed Development. Therefore, based on the information above, significant effects as a result of locational factors are considered unlikely.

Characteristics of the Potential Impact

- 4.20 This section considers the characteristics of the potential impacts from the Proposed Development, having regard to Schedule 3 (3) (a-d) of the EIA Regulations. Initial assessments and analysis have been undertaken to inform a thorough understanding of baseline conditions; to inform the design of the Proposed Development, to understand any possible effects and to ensure that they can be managed such that potential significant adverse effects would not occur.

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- 4.21 During construction, management plans (such as a CEMP and a CTMP) would be implemented to manage construction activities, to prevent temporary emissions of nuisance and pollution (such as noise and dust management).
- 4.22 The extent of the impact of the Proposed Development is localised due to the nature of the proposals and can be satisfactorily mitigated. Where mitigation measures are relevant to GBC's consideration of these issues, they have been set out below.

Landscape

Construction

- 4.23 Potential landscape and visual effects during the construction phase of the Proposed Development are associated with the introduction of construction activity, traffic and fixed plant to an area formerly vacant of large-scale operations or plant. As outlined in the Landscape and Visual Appraisal (**Appendix A3**), the Site has a very localised visual envelope due to the substantial existing vegetation cover. The Site is well-screened, therefore construction activity and plant would be naturally screened, to an extent, from receptors on South Street and Heron Hill Lane such as pedestrians, cyclists, equestrians and drivers.
- 4.24 Additional mitigation measures, such as the erection of hoarding and appropriate use of lighting, would be secured through a CEMP or suitably worded planning condition, which would reduce the potential effects during the construction phase.

Operation

- 4.25 A preliminary Landscape and Visual Appraisal (**Appendix A3**) has been prepared for the Site. It finds that the Site is considered to be of low sensitivity as it is of low landscape value due to the orientation and nature of the landform within and adjoining the Site (given its siting within a plateau landscape that is contained by substantial vegetation cover). It is also of note that the Site is not visible in its entirety from any one location.
- 4.26 The Proposed Development will introduce residential properties to the north western fringe of Culverstone Green, which is in-keeping with the existing residential land uses within the vicinity of the Site. The built development will be designed in line with relevant guidance, will remain sensitive to the local character of Culverstone Green and will utilise landscaping and enhance existing planting to reduce potential effects to sensitive receptors. On this basis, the Landscape and Visual Appraisal finds that development of the Site is considered justified. This will be evidenced through further reporting to be provided with the planning application submission, such as the Landscape and Visual Impact Assessment.

Built Heritage and Archaeology

Construction

- 4.27 As above, the construction phase of the Proposed Development is not expected to give rise to significant landscape and visual effects, due to natural screening and the implementation of the

CEMP, therefore it is not expected to cause significant effects to the settings of the identified built heritage receptors.

- 4.28 The Site does not sit within an archaeological designation, therefore the identification of archaeological deposits on-Site is considered unlikely. Should the Archaeological DBA, to be submitted with the planning application, identify the potential for/ actual deposits, a mitigation plan will be agreed with the Heritage Officer at GBC to mitigate the potential effect through removal and recording of the deposit, or preservation in-situ. Significant effects are therefore not anticipated.

Operation

- 4.29 As above, the Proposed Development will be sensitively designed in line with relevant guidance, in order to reduce potential effects to the landscape. Moreover, the listed buildings in proximity to the Site benefits from existing screening from residential development and vegetation, therefore significant effects to the setting of built heritage receptors are not anticipated.
- 4.30 It is unlikely that there will be any effects to potential archaeological deposits during the operational; phase as, if deposits are identified, the potential effects will have been mitigated during the construction phase.

Flood Risk and Drainage

Construction

- 4.31 The Site sits within Flood Zone 1, and is therefore at low risk of flooding from fluvial (river or the sea) sources. The Site is not at risk of surface water flooding. The Site lies within SPZ 3.
- 4.32 Potential risks to underlying ground conditions during construction will be controlled through standard measures. These measures would form part of the CEMP and include measures such as bunding of storage areas, petrol interceptors and good site management. As such, the Proposed Development is not likely to result in any significant water quality effects or ground conditions effects during construction.
- 4.33 There will be demand for wastewater capacity during the construction works. The CEMP will be implemented prior to and during the construction phase, which will include appropriate measures to manage any discharges of water from the Site to ensure the risk of surface water flooding is mitigated. Therefore, there will be no significant environmental effects during construction.

Operation

- 4.34 The Proposed Development drainage scheme will be designed in accordance with relevant legislation and policy guidance. Potential pollution sources within the operational Proposed Development, such as run-off, will be dealt with through standard design measures and the incorporation of a Surface Water Drainage Strategy (SuDS) and source control methods to ensure surface water is effectively managed. The Proposed Development will implement SuDS features such as detention basins, swales and permeable paving. Controlling flows to greenfield rates and incorporating SuDS into the proposals will ensure that the Proposed Development does not increase

flood risk onsite, or to neighbouring properties. As such, the Proposed Development is not likely to result in any significant impacts on water quality or surface water.

- 4.35 Based on the information above, the Proposed Development is not likely to result in any significant flood risk or drainage related effects that would require an EIA to be undertaken. The proposed FRA and Drainage Strategy will be prepared and submitted as part of the planning application to confirm the proposed management strategy.

Ecology

Construction

- 4.36 With appropriate mitigation measures in place, it is not expected that the construction of the Proposed Development would have a significant effect on nearby ecological receptors. Responsible construction practices, secured by a CEMP, will ensure that there will be no significant adverse effects on identified ecological receptors such as the Ancient Woodland parcels in proximity to the Site.
- 4.37 An Ecological Impact Assessment will be submitted with the planning application, which will identify the potential for habitats and species on-Site; where potential presence is identified, further species-specific surveys will be conducted, and appropriate mitigation will be confirmed such as construction outside of breeding seasons and the protection of certain habitats if required. Following implementation of the proposed measures via the CEMP, no significant effects to ecological receptors are anticipated.

Operation

- 4.38 The Proposed Development will implement a range of landscaping measures to enhance biodiversity at the Site. As discussed, the Ecological Impact Assessment and detailed species surveys (if required) will recommend mitigation measures to avoid significant adverse effects to ecological receptors, which are anticipated to be incorporated to the design of the Proposed Development where practicable.

Transport

Construction

- 4.39 Given the modest scale of the Proposed Development there is predicted to only be a minor increase in light and heavy goods vehicle movements at peak hours and across the day. Traffic generated by the construction of the Proposed Development will be managed through the implementation of a CTMP to ensure that the impact to the local road network is minimised following the introduction of additional light and heavy goods vehicles. No significant effects are expected.

Operation

- 4.40 Once operational, the Proposed Development will lead to an uplift in vehicles accessing and egressing the Site. However, as the Proposed Development is modest in scale, it is considered that the potential trips generated would not trigger significant traffic impacts or unacceptable safety

impacts in Culverstone Green, particularly when accounting for sustainable transport strategy (which will be secured through a Travel Plan). This will be confirmed through detailed transport modelling, to be provided in the Transport Assessment which will accompany the planning applications submission.

Noise and Vibration

Construction

- 4.41 The main source of noise during the construction of the Proposed Development will be from the vehicular access point to the Site (which would potentially impact noise-sensitive receptors along the construction traffic route) and noise generated from operational construction plant, which may potentially impact noise-sensitive receptors within the residential areas surrounding the Site. Best practicable means will be employed to reduce noise as much as possible. A CEMP will be implemented at the Site to reduce the likelihood of adverse impacts. With mitigation measures proposed, which will form part of a CEMP, it is expected no significant environmental effects will be present during construction phase.

Operation

- 4.42 The primary noise source generated during the operational phase will be from traffic associated with the Proposed Development; however, the operational traffic is unlikely to trigger a 'severe' impact or increase from the existing traffic flows, therefore operational traffic is not expected to exceed existing flows to the extent that a significant noise effect is triggered.
- 4.43 A Noise Assessment will be submitted alongside the planning application.

Air Quality

Construction

- 4.44 During the construction works, the greatest potential air quality effects relate to dust nuisance and releases of pollutants into the air. Good practice measures will be implemented to minimise and control dust at source during construction which will be implemented as part of the CEMP, to reduce impact to nearby sensitive receptors. These good practice measures will be detailed through the use of method statements and include measures such as hoarding, water suppression and covering of transport vehicles. Method statements will be based on industry standard guidance published by the Institute of Air Quality Management. Given the implementation of such measures and the temporary nature of construction activities, dust during the construction phase is not expected to give rise to significant or long-term adverse effects on local receptors.
- 4.45 In terms of exhaust emissions, plant and equipment used for construction works will also be modern and compliant with current emissions standards. As above, such measures will be detailed as part of a CEMP. With these standard practice measures in place and due to the scale of Proposed Development, exhaust emissions during construction works are not expected to give rise to significant adverse effects.

4.46 Construction traffic has potential to contribute to existing traffic levels on the surrounding road networks and may impact on local air quality. However, given the modest scale of the Proposed Development and appropriate mitigation measures implemented, there is predicted to only be a minor increase in HGV movements at peak hours and across the day. The temporary increase in traffic is considered unlikely to be significant regarding emissions. Any effects during construction are likely to be short-term and temporary in nature and would be mitigated by the implementation of the CEMP.

4.47 Consideration has been given to the health implications of the construction of the Proposed Development. During construction, the safety of the on-site works and associated health of the on-site workforce will be ensured through regular health and safety measures (e.g. personal protective equipment (PPE)). For surrounding receptors, health and well-being will be managed through a CEMP, that will ensure public safety, amenity and site security, noise and vibration controls and air and dust management. As such, no significant construction related health effects or emissions are anticipated.

Operation

4.48 This Site is not located within, or in proximity to, an AQMA and local reporting identifies that AQS are not exceeded. It is not expected that the operation of the Proposed Development would result in a significant number of vehicle trips to and from the Site; therefore, it is not expected that the operation of the Proposed Development would give rise to significant effects related to air quality. The proposed uses of the Site (residential, employment, care) will not produce significant emissions, and therefore are not anticipated to adversely impact air quality.

Ground Conditions and Contaminated Land

4.49 The ground conditions at the Site will be ascertained through a Phase 1 Site Investigation Study, which will be undertaken prior to any construction works taking place on the Site. Should assessment work identify any sources of contamination on-Site, or pathways to off-Site sources of contamination, these will be remediated prior to works taking place at the Site.

Construction

4.50 The use of appropriate control measures during the construction phase will be implemented to mitigate any risks or impacts, should the presence of ground contamination be encountered.

4.51 Construction workers could conceptually be at risk if they were to be exposed to contaminated soils via the direct contact pathways. However, it is judged that such risks could be effectively ameliorated using appropriate PPE and health and hygiene practices.

4.52 The inhalation of contaminated dust could also have a conceptual impact on both on and off-Site human receptors, particularly if construction was to be carried out during the drier summer months when dust generation is more likely; however, regardless of contamination, appropriate dust suppression measures should be implemented upon all construction sites as good practice, implemented via the CEMP.

-
- 4.53 Although operations during construction could result in discharges to the surface water receptors in the vicinity of the Site, these risks and impacts would be mitigated by conducting the construction phase in accordance with the recommendations of a CEMP.

Operation

- 4.54 Post-construction, the hardstanding and buildings that will occupy the Site will form a permanent physical barrier that will prevent human exposure to any residual ground contamination remaining beneath the Site.
- 4.55 Design of the Site's drainage will need be such that any escape of potential contaminants is contained and not discharged to the ground or surface water bodies in the vicinity.

Waste

Construction

- 4.56 It is recognised that the demolition and construction phases of the Proposed Development will produce a volume of materials that will need to be disposed of correctly. Therefore, the waste materials will be organised in such a manner that maximises recycling and minimises the quantity of materials going to landfill. Best practice measures will be incorporated into a CEMP, which will be in place prior to any works on-Site.

Operation

- 4.57 The Proposed Development is of a similar nature to the existing residential uses that lie within proximity of the Site, meaning that it is unlikely to give rise to waste that could not be incorporated into the existing waste management regime for the current uses on these adjacent sites. Compliance with environmental and waste legislation is a minimum requirement when managing waste and will be a primary objective of the Proposed Development.
- 4.58 Waste and recycling collection will be managed, and waste and recycling storage volumes would accord with relevant requirements. It is unlikely that operation of the Proposed Development would give rise to hazardous waste due to its residential nature. As such, the Proposed Development is not likely to give rise to significant effects in relation to production of waste.

Socio-Economics and Health

Construction

- 4.59 The construction of the Proposed Development would support economic activity in the area such as local jobs and workforce expenditure. Given the modest scale of the Proposed Development, this is considered to be beneficial, but not significant in EIA terms. Likewise, in the wider context of the mobility of construction workers and the level of existing construction employment in Kent, this is not considered significant.
- 4.60 During construction, the health of the on-Site workforce will be protected through measures such as personal protective equipment (PPE). For surrounding sensitive uses, such as residential dwellings, any potential effects on health will be managed through a CEMP with regard to public safety, site

security, noise and vibration and dust management. As such, no significant construction related health effects are anticipated.

Operation

- 4.61 Once operational, due to its proposed uses, the Proposed Development is not anticipated to cause effects to human health through nuisance through generation of significant emissions to air quality (e.g. GHGs, odour, pollutants such as particulate matter) or noise.
- 4.62 An Economic Benefits Statement will accompany the planning submission.

Climate Change and Greenhouse Gases

- 4.63 The IEMA Guide⁴ Assessing Greenhouse Gas Emissions and Evaluating their Significance (February 2022)⁴ states that “...in the absence of any significance criteria or defined threshold, it might be considered that all GHG emissions are significant...”; however, the Guide does provide a means to determine the significance of a Proposed Development’s whole life greenhouse gas (GHG) emissions, in the context of the UK’s net zero compatible trajectory. Where a development is considered compatible with the budgeted, science-based 1.5°C trajectory, or where it goes substantially beyond this, it may be concluded that the effect of a development with respect to GHG will be not significant.

Construction

- 4.64 During construction of the Proposed Development, best practice measures will be employed to minimise GHG emissions associated with construction vehicles and plant. This will be outlined within a CEMP, to be secured through a suitably worded planning condition, and significant effects are therefore not anticipated.

Operation

- 4.65 The Proposed Development will incorporate appropriate climate change adaption measures designed to address the potential risks associated with climate change, including allowance for storm events in drainage design and implementation of energy efficiency measures within the design of the built development in order to reduce production of GHGs.
- 4.66 It is anticipated that the GHG emissions associated with both the construction and operation of the Proposed Development will fall below those required to align with the 1.5°C trajectory. Therefore, it

⁴ IEMA (2022) Environmental Impact Assessment Guide to: Assessing Greenhouse Gas Emissions and Evaluating their Significance. Available at < https://www.iema.net/media/soanjg22/eia-guide_ghg-assessment-and-significance_iema_16may17.pdf>

is considered that the Proposed Development will not have a significant impact with respect to the GHG emissions.

Major Accidents, Fire and Natural Disasters

- 4.67 The Applicant is obliged to follow the necessary safety and maintenance procedures required during the construction and operation of the Proposed Development, to ensure the facility is operating safely. Therefore, the risk of a major accidents or disaster is not considered to be significant.
- 4.68 There are no hazardous uses comprised in the Proposed Development, therefore major accidents are not anticipated once operational.

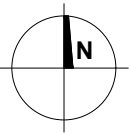
Summary

- 4.69 Having considered the characteristics of the potential impacts above, it is considered that there is unlikely to be likely significant effects. Where relevant, detailed assessments will be undertaken in accordance with appropriate guidance and submitted as part of the planning application as standalone supporting planning documents.

5. CONCLUSION

- 5.1 This EIA Screening Opinion request has been prepared in accordance with the EIA Regulations in order to ascertain whether the Proposed Development would require an Environmental Statement to be submitted as part of the planning application.
- 5.2 The PPG contains specific guidance on the EIA Regulations, and sets out that the focus should be on those effects which are significant, when determining if a development requires an EIA. The relevant indicative threshold and criteria outlined in the PPG are *“if a development would have significant urbanising effects in a previously non-urbanised area (e.g. a new development of more than 1,000 dwellings).”* The Proposed Development seeks to provide up to 100 dwellings as a natural urban extension to Culverstone Green, which is significantly less than the 1,000 dwellings stated. Moreover, it is considered that the technical reporting (**Appendix A2**) to be submitted with the planning application, which will inform the design of the Proposed Development, will ensure that any potential significant effects are identified and mitigated.
- 5.3 The Proposed Development comprises the development of the land to provide up to 100 new homes of up to two storeys in height. The Proposed Development would be similar in nature to the existing surrounding land uses, thereby responding sensitively to the residential context of Culverstone Green, to the north, south, east and west of the Site. Consequently, the extent of the impact of the Proposed Development will be localised in nature and characteristic of its end use. Embedded mitigation measures are incorporated in the design of the Proposed Development in order to ensure the design is sensitive to local constraints, whilst additional mitigation measures will be ascertained, where necessary, in further reporting to be submitted with the planning application.
- 5.4 Good construction practice and site operations will ensure minimal effects to the local environment, whilst its temporary nature will be offset by benefits the development will deliver. Effects will therefore be mainly limited and local in nature.
- 5.5 It is anticipated that the operation of the Proposed Development will give rise to beneficial effects on the local housing market, although these will not be significant considering the modest scale of the Proposed Development. Furthermore, the Proposed Development would be a natural extension to Culverstone Green.
- 5.6 Iceni submits this report on behalf of the Applicant to formally request a Screening Opinion in relation to the Proposed Development, in accordance with the EIA Regulations, from GBC confirming that the Proposed Development would **not result** in significant environmental effects and the submission of an Environmental Statement is not required.

A1. SITE LOCATION PLAN



NOTES:

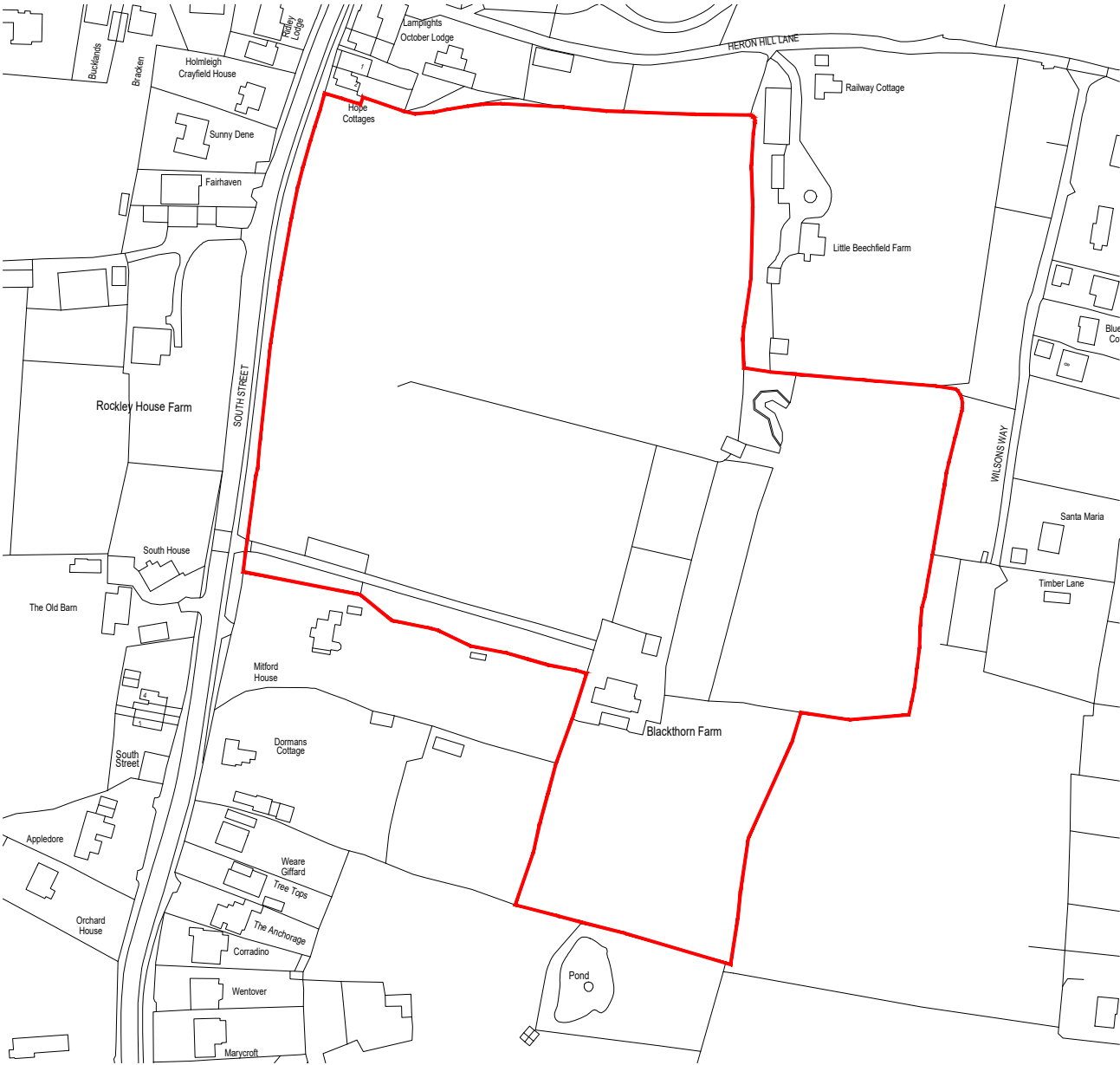
Report all discrepancies, errors and omissions.

Verify all dimensions on site before commencing any work on site or preparing shop drawings.

All materials, components and workmanship are to comply with the relevant British Standards, Codes of Practice, and appropriate manufacturers recommendations that from time to time shall apply.

For all specialist work, see relevant drawings.

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Rev	Date	Description
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Project Title

**Proposed Residential Development at
Blackthorn Farm,
Culverstone Green**

Drawing Description

Site Location Plan

Scale	Drawn by
1:2500 @ A3	JS
Date	Checked by
February 2025	TWM

CLAGUE ARCHITECTS

62 Burgate, Canterbury
Kent CT1 2BH

01227 762061

1 Kinsbourne Court, Luton Road,
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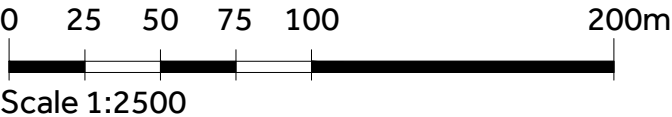
01582 765101

8, Disney Street
London SE1 1JF

0203 597 6111

CANTERBURY LONDON HARPENDEN

Drawing Number	Revision
23557B / 01	-



A2. INDICATIVE LIST OF PLANNING APPLICATION SUPPORTING DOCUMENTS

- Air Quality Assessment
 - Arboricultural Impact Assessment and Tree survey
 - Desk Based Archaeological Assessment
 - Design and Access Statement
 - Flood Risk Assessment and Drainage Assessment
 - Ecological Impact Assessment
 - BNG Assessment
 - Phase 1 Site Investigation
 - Transport Assessment
 - Landscape and Visual Impact Assessment
 - Landscape Masterplan
 - Utilities Assessment
 - Economic Benefit Statement
 - Noise Assessment
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