

Our ref: PR3396/SC

Date: 11 October 2021

Mrs Wendy Lane
Assistant Director Planning
Gravesham Borough Council
Civic Centre
Windmill Street
Gravesend
DA12 1AU

Dear Mrs Lane,

Town and Country Planning (Environmental Impact Assessment) Regulations 2017

Request under Regulation 6 for a Screening Opinion

Proposed redevelopment of existing industrial premises/estate for mixed Class E(g), B2 and B8 uses.

LAND AT DENTON SLIPWAYS WHARF ROAD GRAVESEND KENT DA12 2RU

1. Purpose

- 1.1** This screening request is submitted on behalf of Feabrex Ltd of Albion Parade, Gravesend, DA12 2RN, and is made pursuant to Regulation 6 of the Environmental Impact Assessment Regulations 2017 and seeks an opinion as to whether the proposed redevelopment of the existing industrial site at Denton Slipway, Wharf Road, Gravesend DA12 2RU, to provide new mixed Class E(g) B2 and B8 employment units constitutes a project requiring Environmental Impact Assessment (EIA) in accordance with Regulation 5(4) of the Town and Country Planning (Environmental Impact Assessment) Regulations 2017 (the EIA Regulations).
- 1.2** This letter and the accompanying documentation set out the information required by the determining Authority in accordance with Regulation 6(2) to enable it to issue its Screening Opinion.

2. Proposed development

- 2.1** The site area amounts to approximately 0.99ha (2.4acres) and is shown on the location plan attached at **Appendix One**. A planning application is currently being prepared that would see the existing site redeveloped and 18 new replacement employment units erected together with associated internal access roads parking and turning space. Approximately 3168m² of employment floorspace is currently envisaged in the 18 units (8 units @ 18m x 12m and 10 units @ 12 x 12m) plus mezzanine floor provision in all the units. A total of 65 car and van parking spaces are indicated. An initial site layout is attached at **Appendix Two**.

- 2.2 The proposed development accords with adopted Development Plan policy. The Gravesham Core Strategy Local Plan 2014 includes the site as part of the Riverside Industrial Area, a smaller sub-area of the larger Gravesend Riverside East and North-East Gravesend Opportunity Area. The site lies to the north of the in-filled section of the former Thames and Medway Canal between the canal basin and Mark Lane which the Council wishes to see opened-up as opportunities arise and has safeguarded its former line to achieve this. The development proposals do not affect this. The Core Strategy states that it seeks to retain the existing uses in the sub-area and to provide protection for them from sensitive uses. Support will also be given to proposals that improve the environment of the area.

3. Site location

- 3.1 The site is located at the western end of Wharf Road. It is currently occupied by a number of businesses including MRI-Online (specialist heavy plant/mechanical removers and installers), Metal Aspects (steel fabricators), car repair/breaking and scaffold yards. The site is subdivided into a number of enclosed yard spaces. There are large buildings on the southern side of the site. The total amount of existing floorspace on the site is approximately 2173.71m². To the north is the River Thames, however, the existing jetty along the northern boundary forms part of the land leased to Cory Ship Repairs who are located on the slipway and yard immediately to the east. There is no direct access to the river from the site. A flood wall forms the western and southern boundaries of the site.



Google Earth Image dated 23/04/2020

4. The proposed development and the screening process

- 4.1 The EIA Regulations apply to certain types of development that may have significant effects on the environment. The EIA Regulations categorise various development types as 'Schedule

1' or 'Schedule 2' development, with the nature of the proposals, their location and scale being the determining factors as to whether they are likely to have significant effects.

- 4.2** All Schedule 1 development and some Schedule 2 developments, where they are likely to have significant effects, are termed “EIA developments”. The proposed development is not of a type described within Schedule 1 of the EIA Regulations where EIA is automatically required.
- 4.3** Where a development is of a type described in Schedule 2, EIA is more likely to be required if the development site is in a sensitive area or the attributes of the development exceed or meet any of the applicable thresholds and criteria set out in the Regulations.
- 4.4** In this case, the Proposed Development is Infrastructure Development of a type described in section 10(a) of Schedule 2: Industrial Estate Development Projects. The applicable threshold for such development is a site that exceeds 5ha in area.
- 4.5** The National Planning Practice Guidance (NPPG) advises that the more environmentally sensitive the location, the more likely it is that the effects will be significant and will require EIA.
- 4.6** Regulation 2(1) defines certain designated sites as “sensitive areas” where the thresholds in the Schedule 2 do not apply. All developments that lie within or partly within a sensitive area must be screened for EIA regardless of the size of the site or scale of the development proposed.

“sensitive area” is defined as any of the following—

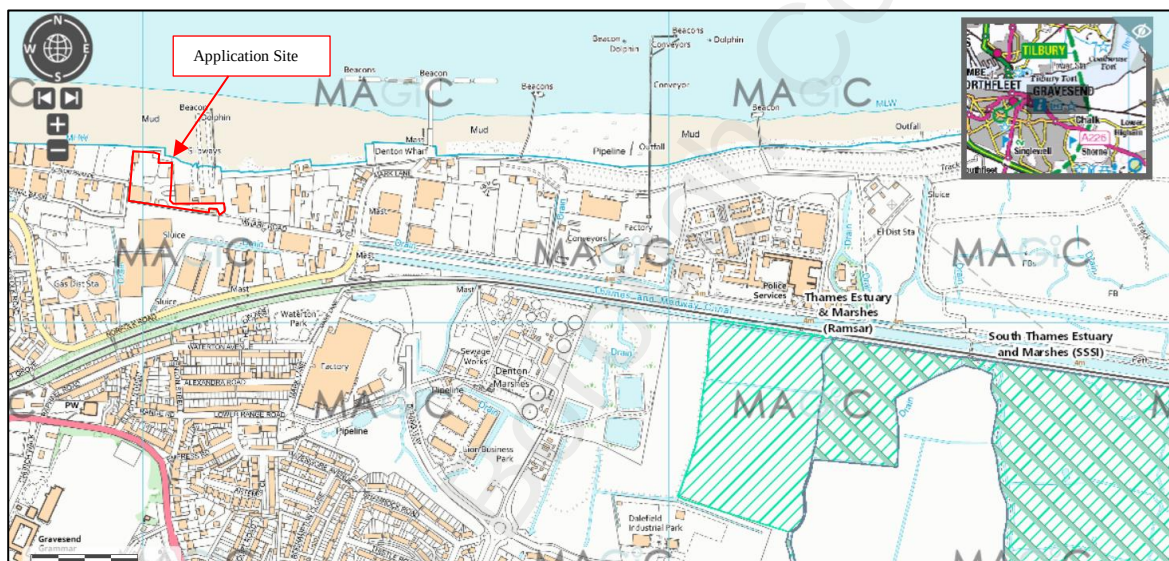
- (a) land notified under section 28(1) (sites of special scientific interest) of the Wildlife and Countryside Act 1981;
- (b) a National Park within the meaning of the National Parks and Access to the Countryside Act 1949;
- (c) the Broads;
- (d) a property appearing on the World Heritage List kept under article 11(2) of the 1972 UNESCO Convention Concerning the Protection of the World Cultural and Natural Heritage;
- (e) a scheduled monument within the meaning of the Ancient Monuments and Archaeological Areas Act 1979;
- (f) an area of outstanding natural beauty designated as such by an order made by Natural England under section 82(1) (areas of outstanding natural beauty) of the Countryside and Rights of Way Act 2000 as confirmed by the Secretary of State;
- (g) a European site;

- 4.7** The proposed application site has been assessed against this list as follows;

Sensitive Area		Applicable
a	Site of Special Scientific Interest	No
b	National Park	No
c	The Broads	No
d	World Heritage Site	No
e	Scheduled Monument	No
f	Area of Outstanding Natural Beauty	No
g	European Site	No

- 4.8** The site is not located within or partly within a sensitive area as defined in the Regulations.

- 4.9** In accordance with the NPPG, other statutory and non-statutory designations have been considered which are not included in the definition of “sensitive areas”, but which are nonetheless environmentally sensitive and so may be relevant in determining whether EIA is required. Regard has also been had as to whether any national or internationally agreed environmental standards are being approached or exceeded in this location.
- 4.10** As indicated in the Magic Map extracts below, the site is located 1km from the western boundary of the Thames Estuary and Marshes Ramsar Site.
- 4.11** With regard to categories (a) and (g) listed in paragraph 4.7 above, the western boundaries of the Thames Estuary and Marshes Ramsar Site and South Thames Estuary and Marshes SSSI are located approximately 1km to the east of the application site, on the south side of the Thames and Medway Canal and Gravesend-Medway railway-line.



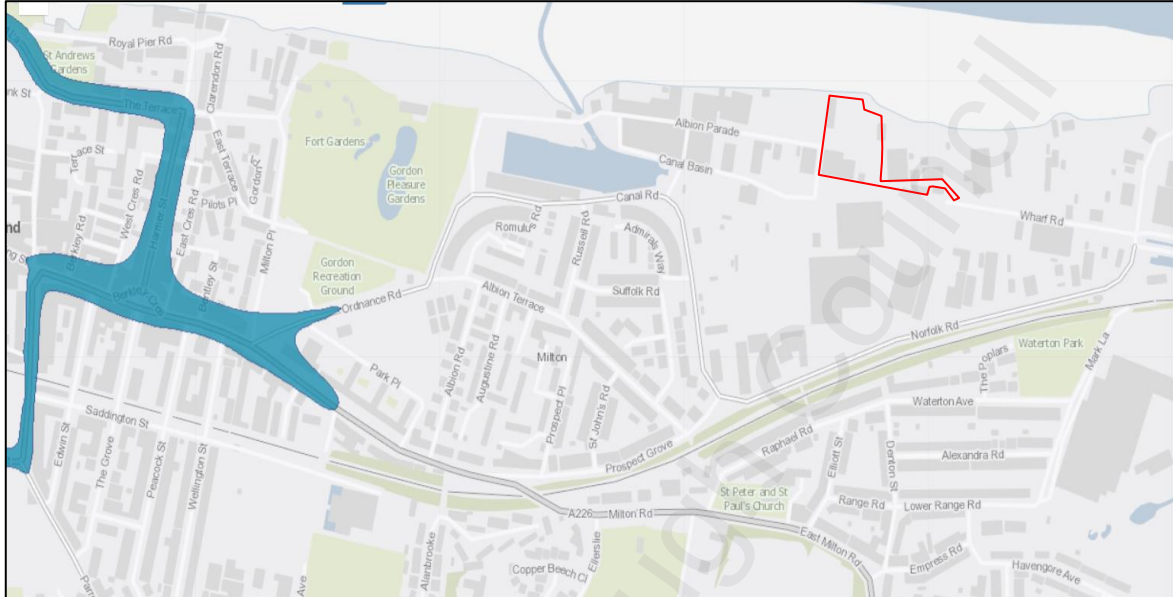
Magic Map Extract

- 4.12** The wider context of these designations is shown in the following map extract. The Thames Estuary and Marshes Special Protection Area (SPA) also encompasses some of the shoreline and land east of the site but is approximately 2km from the site at its closest point.



Magic Map Extract

- 4.13** The site is also approximately 1.8km by road from the junction of Ordnance Road and Milton Road which lies the eastern end of the Gravesend One Way System Air Quality Management Area declared in April 2005. An extract from the DEFRA UK Air Information Resource website is included below. This partially shows the extent of the AQMA (namely the area closest to the application site) which is shaded in blue.



DEFRA UK Air Information Resource

5. Threshold

- 5.1** The proposed development is a Schedule 2 development and as indicated earlier falls within section 10(a) of Schedule 2: Industrial Estate Development Projects. The applicable threshold for such development set out in the Schedule to the EIA Regulations is a site that exceeds 5ha in area.
- 5.2** The proposed application site extends to approximately 0.99ha which is significantly under the 5ha threshold. As a Schedule 2 development therefore, the decision as to whether EIA is required depends on an examination of whether the proposed development is likely to have likely significant environmental effects.

6 Potential environmental effects

- 6.1** Schedule 3 of the EIA Regulations set out the areas that must be considered when screening Schedule 2 development such as that proposed in this project. Three main areas should be considered;

1: Characteristics of Development with particular regard to

- (a) the size and design of the whole development;
- (b) cumulation with other existing development and/or approved development;
- (c) the use of natural resources, in particular land, soil, water and biodiversity;
- (d) the production of waste;
- (e) pollution and nuisances;
- (f) the risk of major accidents and/or disasters relevant to the development concerned, including those caused by climate change, in accordance with scientific knowledge;
- (g) the risks to human health (for example, due to water contamination or air pollution).

2: Location of Development with particular regard to

- (a) the existing and approved land use;
- (b) the relative abundance, availability, quality and regenerative capacity of natural resources (including soil, land, water and biodiversity) in the area and its underground;
- (c) the absorption capacity of the natural environment, paying particular attention to the following areas—
 - (i) wetlands, riparian areas, river mouths;
 - (ii) coastal zones and the marine environment;
 - (iii) mountain and forest areas;
 - (iv) nature reserves and parks;
 - (v) European sites and other areas classified or protected under national legislation;
 - (vi) areas in which there has already been a failure to meet the environmental quality standards, laid down in Union legislation and relevant to the project, or in which it is considered that there is such a failure;
 - (vii) densely populated areas;
 - (viii) landscapes and sites of historical, cultural or archaeological significance.

3: Type and Characteristics of Potential Impact

The likely significant effects of the development on the environment must be considered in relation to criteria set out in paragraphs 1 and 2 above, with regard to the impact of the development on the factors specified in regulation 4(2), taking into account—

- (a) the magnitude and spatial extent of the impact (for example geographical area and size of the population likely to be affected);
- (b) the nature of the impact;
- (c) the transboundary nature of the impact;
- (d) the intensity and complexity of the impact;
- (e) the probability of the impact;
- (f) the expected onset, duration, frequency and reversibility of the impact;
- (g) the cumulation of the impact with the impact of other existing and/or approved development;
- (h) the possibility of effectively reducing the impact.

6.2 The factors specified in Paragraph 4(2) of the Regulations are as follows.

- (a) population and human health;
- (b) biodiversity, with particular attention to species and habitats protected under Directive 92/43/EEC and Directive 2009/147/EC;
- (c) land, soil, water, air and climate;
- (d) material assets, cultural heritage and the landscape;
- (e) the interaction between the factors referred to in sub-paragraphs (a) to (d).

6.3 The potential for significant effects to result from the Proposed Development is discussed under relevant headings below.

Traffic and Transport

6.4 The existing floorspace of the buildings on the site amounts to some 2173.71m². As currently envisaged the proposed floorspace is approximately 3168m². This represents an overall increase of approximately 1000m².

6.5 The Applicants have commissioned a Transport Consultant (L Brown Associates) to undertake a Transport Assessment of the proposed development which would accompany any application. A letter and brief report accompany this request and are attached at **Appendix Three**. The Consultant has assessed likely trip generation and potential impact from the additional 1000m² on the site in conjunction with the likely traffic generation from the Canal Basin development site and in particular the potential impact on the Ordnance Road/Milton Road signal controlled junction. The report identifies that there would be no impact on this junction. The redevelopment is also likely to result in fewer HGV movements to and from the site. This would be detailed in any Transport Assessment.

6.6 It is considered therefore that the development is not likely to result in significant adverse effects on traffic and transport.

Noise

6.7 The current uses on the site are largely a mixture of metal fabrication car repair/breaking, heavy machinery haulage and lifting and scaffold yards. Where buildings exist they are not well insulated and work often takes place with doors open or in the open-air. All of the current uses are potentially noisy and intrusive.

6.8 The applicant's development team are also of course cognisant of the fact that the Council have resolved to grant a 'Hybrid' planning permission for a major mixed use residential and employment scheme on the land immediately to the west of the site and around the Canal Basin (Application 20210270 refers). The area immediately to the west of this site was not subject to the detailed element of the Hybrid application however.

6.9 As part of the preparation of the application on this site an acoustic assessment has been commissioned and is under-way (Lustre Consulting). This will establish a clear existing background from which to assess noise from the development as proposed.

6.10 Given that it is proposed to replace the existing uses and buildings with a purpose-built development meeting current standards and with appropriate insulation etc. and that the majority, if not all, of the open storage and working practices will cease it is not considered that the development will result in significant adverse effects arising from noise.

Flood Risk, Drainage and Water Quality

6.11 The site is located immediately adjacent to the River Thames and lies within flood zones 2 and 3. It is not within a Source Protection Zone. The applicant's appointed Drainage Consultants (HOP Consultancy) are actively engaged as part of the Development Team in seeking pre-application advice from the Environment Agency and the Kent County Council Flood and Water Management Team. A draft Flood Risk and Surface Water drainage assessment has been prepared and a CCTV survey of existing drainage at the site undertaken to assist those discussions. A Drainage Strategy for the site has also been prepared

6.12 A Drainage Strategy for the site has also been prepared by the applicant's consultants to facilitate on-going discussions which indicates that foul and surface water can be appropriately managed, in particular surface water, which is drained from the site in an unmanaged way at the moment and thus poses a potential risk to adjoining sites.

6.13 It is not considered that the development will result in significant adverse effects arising from Flood Risk Drainage and Water Quality

Contamination

- 6.14** The applicant has commissioned a Phase-one Contamination Assessment from Lustre Consulting. This study has determined that there is likely contamination present on site in a circumstance which could lead to unacceptable risks to identified receptors. This reflects the likely presence of potentially significant contamination associated with the:
- former ship-yard / iron works and engineering works,
 - reclaimed/raised land in the northern part of the site,
 - infilled canal and associated landfill designation in the southern part of the site, and
 - contemporaneous site activities

Based on these findings and with due regard to the proposed redevelopment of the site for a commercial development rather than residential, it is the opinion of Lustre that the site represents an overall moderate risk with respect to environmental issues. A Phase 2 Site Investigation is recommended to determine the condition of the shallow soils, nature of the infilled materials, ground gas regime and condition of groundwater.

- 6.15** The finalised contamination assessment will be submitted alongside the planning application. The recommended intrusive Phase 2 investigation and any remediation that is identified as a result, can be secured through appropriate planning conditions on any permission that is granted.
- 6.16** As an existing long-standing industrial site which is proposed to be remediated as required and redeveloped for an employment use it is not considered that the proposed development will result in significant adverse effects arising from contamination.

Air Quality

- 6.17** The guidance in 'Land-Use Planning & Development Control: Planning For Air Quality' issued by the Institute of Air Quality Management states that an air quality assessment is required where Average Annual Daily Traffic flows increases by more than 100 within or adjacent to an AQMA. Increases in traffic below this level can therefore be considered negligible.
- 6.18** Given the likely traffic generation associated with the proposed development relative to its existing use traffic flows as identified by the Transport Consultant are not likely to be significant. The differences, if any are likely to be marginal and unlikely to be above the guidance recommendations. The likelihood of a significant effect for the purpose of the EIA Regulations is minimal.
- 6.19** With regard to construction standard and proven methodologies are available to minimise dust effects. Following the application of appropriate levels of mitigation to control dust emissions it is contended that residual effects will be reduced to a level that is not significant.
- 6.20** All existing buildings will be inspected for the presence of asbestos and should asbestos exist all contractors will be licenced with the Health and Safety Executive and qualified in dealing with its safe disposal. It is expected that a Construction Environmental Management Plan will form of a condition of any planning consent for the development within which dust and asbestos mitigation measures form standard practice.
- 6.21** On the basis of the above no likely significant air quality effects are predicted to result from the Proposed Development.

Archaeology and Cultural Heritage

- 6.22** There are no Scheduled Monuments, and World Heritage Sites within or in close proximity to the Site. The nearest Listed Structures are the ‘barrelled lock chamber, sea walls, swing bridge, locks and canal basin’ which are located on Canal Road some 260m to the west of the site. Given the type of development proposed and the intervening existing and proposed development it is not considered that the development will have an effect on the setting of these structures. No likely significant effects are therefore anticipated in terms of archaeology and Cultural Heritage. It is not intended that a Heritage Statement will be prepared to support the application.

Ecology

- 6.23** A preliminary ecological appraisal which provides sufficient information for the Local Planning Authority to undertake Appropriate Assessment under the Habitats Regulations has been undertaken on behalf of the applicant by Calumma Ecological Services. The report will be submitted with the application.
- 6.24** The report followed an examination of the site itself and assessment of locally available biodiversity records. It indicates that no protected species are present on site and that no further ecological survey work is required.
- 6.25** It also concludes that no direct disturbance to European and Ramsar designated sites is expected given the 1.3km separation between the site and the designated land. In terms of noise, vibration and visual disturbance, available information suggests that waterfowl typically display a flight response to disturbance that occurs up to 100 m, with distances over 200m also recorded for some species. Since the proposed development is located more than 1 km from the European and Ramsar designated sites, proposed development construction activity is unlikely to cause significant disturbance. Post construction activities within the new industrial units may also result in noise and visual disturbance. However, this is not considered likely to represent a significantly increased level of disturbance over existing activities. No likely significant effects are therefore anticipated

Landscape Townscape and Visual Impact

- 6.26** The site is already developed and occupied by a range of temporary and permanent buildings and structures. The proposed development will result in new employment development in what is still an existing employment area and will be of a form that will enhance the appearance of the site. No likely significant effects are anticipated.

Climate Change

- 6.27** The development will be built in accordance with the Building Regulations in force at the time of construction. The new buildings will be significantly better insulated and more energy efficient than the buildings currently on site.
- 6.28** Given the site’s location within Flood Zones 2 and 3 and its proximity to the River Thames the implications of fluvial and tidal flooding for the site are important considerations. As part of the work to produce the FRA and Drainage Strategy for the redevelopment of the site, the impact of climate change on the development will be fully considered and the implications taken into account and incorporated into the design of the proposals as they are developed. The FRA and Drainage Strategy would be submitted along side the planning application. No likely significant effects are anticipated.

Human health

- 6.29** The potential health impacts of the proposed development are considered to relate to noise, land contamination and air quality. As identified in this Screening Request no likely significant effects on air quality, the noise environment or resulting from land contamination are anticipated. No likely significant human health effects are therefore anticipated.

Major Accidents or Disasters

- 6.30** The nature of the proposed development and its location indicate that it is not likely to result in accidents or disasters that would result in significant environmental effects or is vulnerable to accidents and disasters from neighbouring land uses.
- 6.31** Alongside the Phase 1 Contamination Report a Preliminary Unexploded Ordnance Assessment has been undertaken. The report has concluded that the potential for unexploded WWI and WWII ordnance to exist at this site is assessed as being UNLIKELY. It further states that in accordance with Construction Industry Research and Information Association (CIRIA) C681 Chapter 5 on managing UXO risks that NO FURTHER ACTION is required to address the UXO risk at this Study Site. No likely significant effects are therefore anticipated

Cumulative Effects

- 6.32** There is one site proposed for development in proximity to the site subject of this Screening Request.
Albion Waterside Canal Basin Gravesend Kent
20210270: Hybrid planning application comprising:
Part A - Full planning application for demolition of existing buildings and structures, construction of a mixed use development comprising C3 and C2 Residential Uses and commercial floorspace (Use Class E), a new river wall, works to Swing Bridge, highway junction improvements at Milton Road and Ordnance Road, associated new public open spaces and public realm improvements, car and cycle parking, landscaping, infrastructure and earthworks and ancillary works; and

Part B - Outline planning application with all matters reserved (apart from access) for demolition of all existing buildings and structures and the construction of a mixed use development comprising C3 Uses and commercial floorspace (Use Class E) with associated vehicular access, car parking, landscaping, associated infrastructure and earthworks and ancillary works.

(The proposed development would consist of up to 1,500 homes and up to 4,500sqm (GIA) of commercial floorspace).
- 6.33** The Council's Planning Committee on 21 July resolved to grant permission for the proposed development subject to referral of the application to the Secretary of State as a departure from the Development Plan and also the completion of a s106 Legal Agreement to maximise the delivery of affordable housing and securing the mitigation necessary to make the development acceptable in planning terms. At the time of drafting this request, the s106 agreement has not yet been completed and therefore planning permission has not been granted.
- 6.34** The main area in which a cumulative effect is most likely to occur is considered to be the traffic generated by the proposed development on the two sites. As noted above, the applicant's Transport Consultant has assessed likely traffic generation from the Screening Site

in conjunction with the predicted traffic flows of the adjacent Canal Basin site (**Appendix Three**).

- 6.35** The Consultant has assessed likely trip generation and potential impact from the additional 1000m² on the site in conjunction with the likely traffic generation from the Canal Basin development site and in particular the potential impact on the Ordnance Road/Milton Road signal controlled junction. The report identifies that there would be no impact on this junction. The redevelopment is also likely to result in fewer HGV movements to and from the site. This would be detailed in any Transport Assessment.
- 6.36** It is also likely that any existing Air Quality and Noise impacts on the Screening Site will be reduced by the proposed development for which this opinion is sought. Contamination, Flood risk/drainage and the impact of climate change will be addressed through the application submission.

7 Conclusion

- 7.1** This Screening Request has been prepared on behalf of Feabrex Ltd. as a formal request to Gravesham Borough Council for an opinion as to whether the redevelopment of part of the existing Denton Slipway Site Wharf Road Gravesend to provide a mixed Class E(g) B2 and B8 development of approximately 3168m² of employment floorspace in 18 purpose-built units, constitutes a project requiring Environmental Impact Assessment (EIA)
- 7.2** This review has worked through the screening process and concluded that:
- The development is not of a type described in Schedule 1;
 - The development is of a type described in Schedule 2;
 - The development site is not located within a sensitive area;
 - The development is Schedule 2 development;
 - The development is not likely to result in significant environmental effects and is not an EIA development.
- 7.3** Whilst the decision rests with Gravesham Council, this Screening Request concludes that subject to the relevant standard and proven mitigation measures set out, the Proposed Development does not require EIA, as it is not considered likely to result in significant environmental effects.
- 7.4** We look forward to receiving the Council's formal decision adopting the Screening Opinion within three weeks of the receipt by the Council of this Screening Request as required by Regulation 6(6) of the EIA Regulations 2017

Yours sincerely,



STEVE CLARKE
Associate Planner

APPENDIX ONE

Site Location Plan

Gravesham Borough Council

Note
This drawing is protected by copyright and must not be copied or reproduced without the written consent of Graham Simpkin Planning. All dimensions and sizes to be checked on site.
North points are indicative. ©



Site Location Plan
1:1250



2 The Parade, Ash Road, Hartley
Longfield, Kent DA3 8BG
Tel: 01474 703705
www.grahamsimpkinplanning.co.uk
Email: webmail@grahamsimpkinplanning.co.uk

Project Title Land at Wharf Road, Gravesend DA12 2RU		Job No 3169
Drawing Title Site Location Plan		Drawing No 01
		Revision
Date 14.02.2021		Drawn by MS
		Checked by SC
Scale		
1:1250 @ A2		
Note		
0102030405060 1:1250metres		
N		

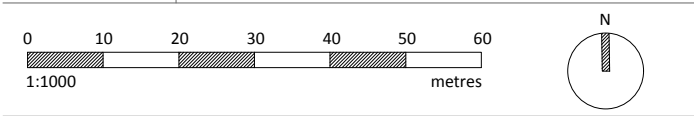


This drawing is protected by copyright and must not be copied or reproduced without the written consent of Graham Simpkin Planning. All dimensions and sizes to be checked on site. North points are indicative. ©

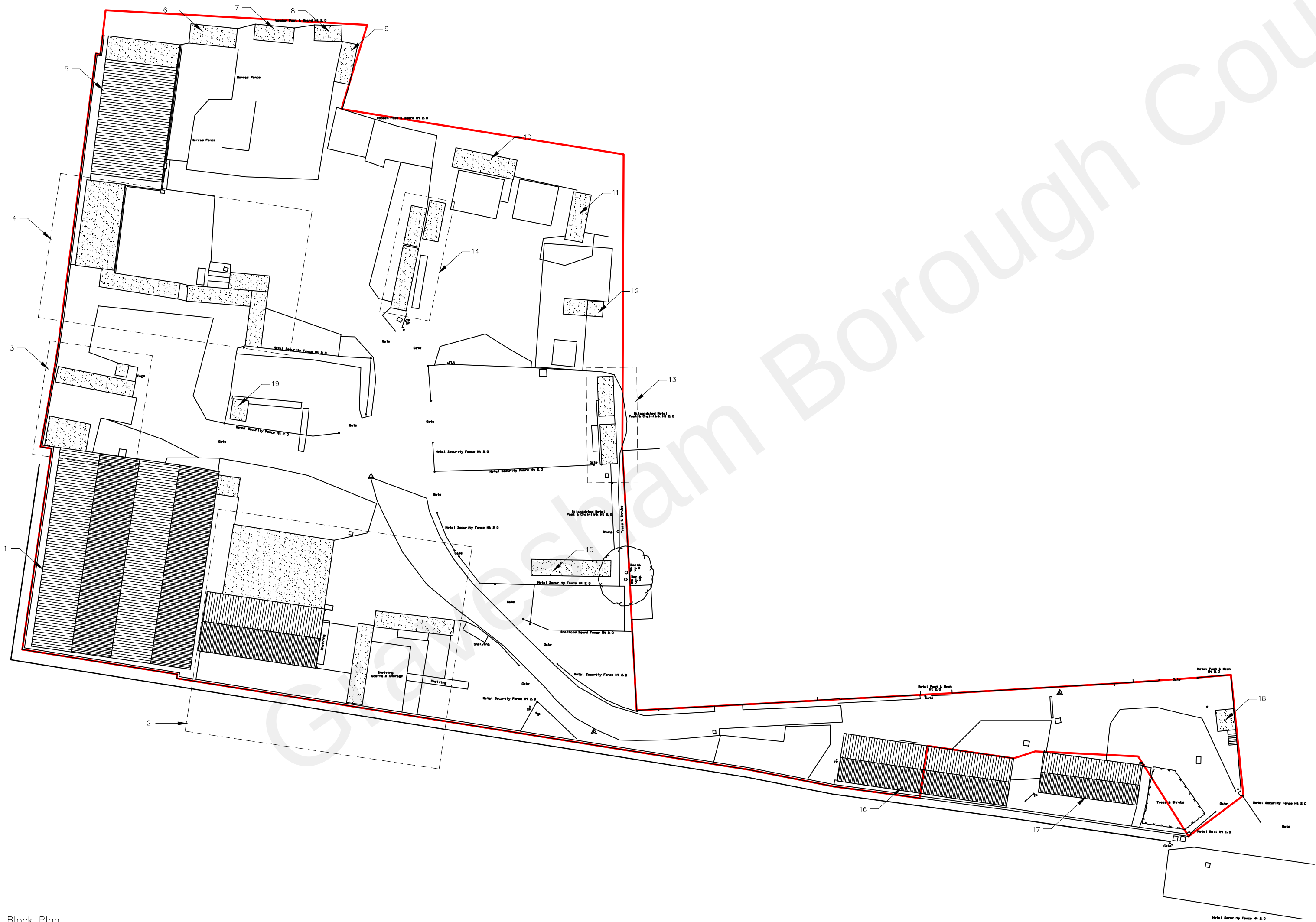
GSP
Graham Simpkin Planning

2 The Parade, Ash Road, Hartley
Longfield, Kent DA3 8BG
Tel: 01474 703705
www: www.grahamsimpkinplanning.co.uk
Email: webmail@grahamsimpkinplanning.co.uk

Project Title Land at Wharf Road, Gravesend, DA12 2RU		Job No 3197
Drawing Title Site Location Plan	Drawing No 02	Revision A
Date 26.11.2020	Drawn by MDE	Checked by SC
Scale 1:1000 @ A3	Note Red Line Area = 9970m ²	



Note
This drawing is protected by copyright and must not be copied or reproduced without the written consent of Graham Simpkin Planning. All dimensions and sizes to be checked on site.
North points are indicative. ©



Existing Block Plan
1:500

Building group	Footprint:	Volume:
1	750.25 m2 9.81 m2	5173.61 m3 51.01 m3
2	29.47 m2 29.47 m2 166.19 m2 166.61 m2	160.37 m3 75.15 m3 726.47 m3 806.34 m3
3	28.8 m2 27.8 m2 3.37 m2	74.88 m3 66.72 m3 5.84 m3
4	78.35 m2 30.34 m2 23.69 m2 20.73 m2 14.92 m2	259.95 m3 75.55 m3 61.83 m3 109.66 m3 43.72 m3
5	191.66 m2 39.34 m2	779.76 m3 131 m3
6	21.2 m2	67.42 m3
7	14.46 m2	37.30 m3
8	9.8 m2	25.75 m3
9	15.06 m2	37.35 m3
10	28.4 m2	70.43 m3
11	20.24 m2	49.95 m3
12	14.52 m2	36 m3
13	14.57 m2 14.5 m2 25.76 m2	34.97 m3 34.80 m3 72.39 m3
14	23.37 m2 14.41 m2 14.41 m2	56.1 m3 34.59 m3 34.6 m3
15	29.71 m2	71.3 m3
16	192.41 m2	696.63 m3
17	93.68 m2	320.45 m3
18	8.8 m2	20.24 m3
19	7.61 m2	19.79 m3
Total	2173.71 m2	10321.92 m3



2 The Parade, Ash Road, Hartley
Longfield, Kent DA3 8BG
Tel: 01474 703705
www.grahamsimpkinplanning.co.uk
Email: webmail@grahamsimpkinplanning.co.uk

Project Title Land at Wharf Road, Gravesend DA12 2RU		Job No 3169
Drawing Title Existing Block Plan	Drawing No 02	Revision
Date 14.02.2021	Drawn by MS	Checked by SC

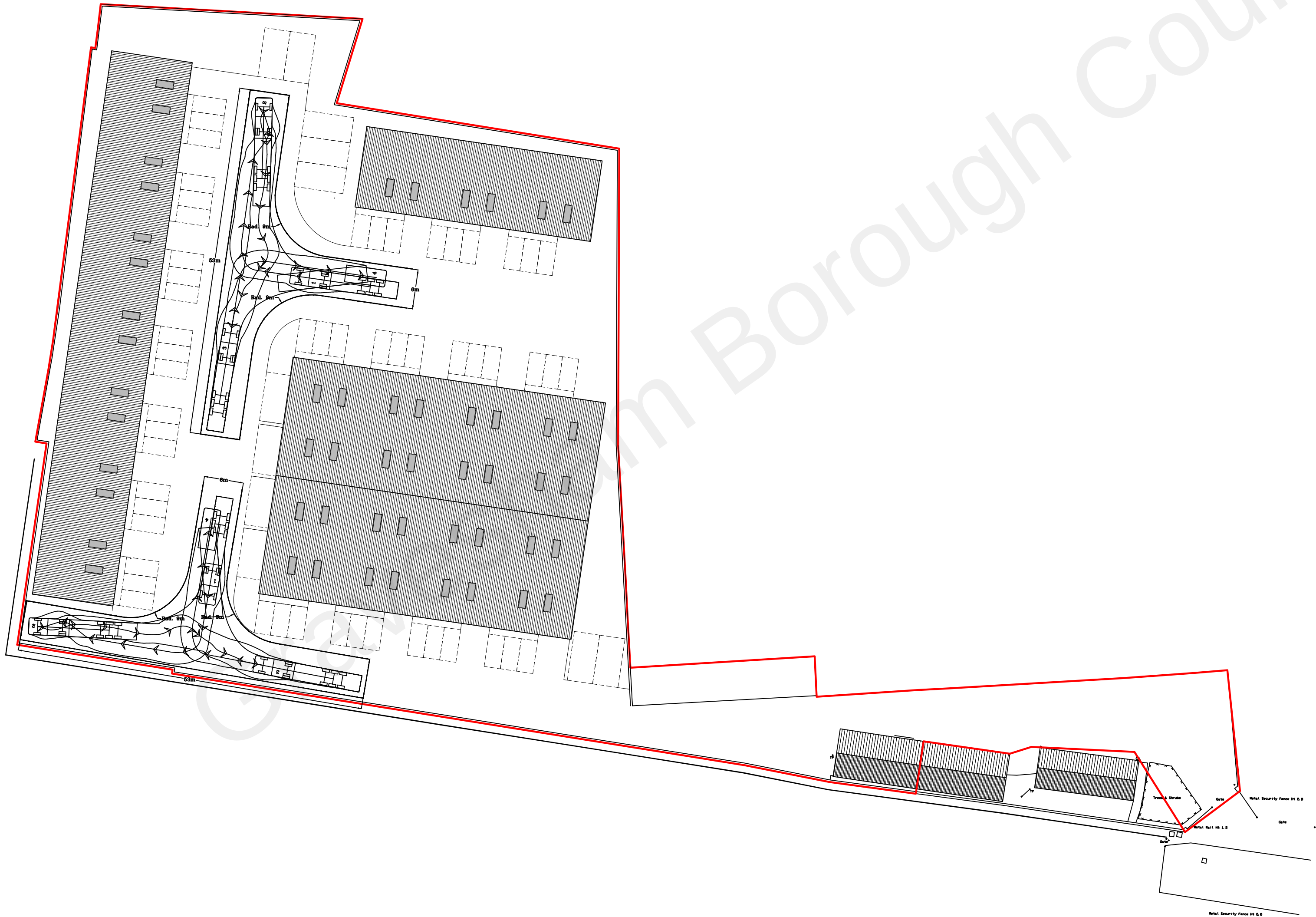
Scale 1:500 @ A2	Note
0 5 10 15 20 25 30 1:500 metres	N 0

APPENDIX TWO

Provisional Site Layout

Gravesham Borough Council

Note
This drawing is protected by copyright and must not be copied or reproduced without the written consent of Graham Simpkin Planning. All dimensions and sizes to be checked on site.
North points are indicative. ©

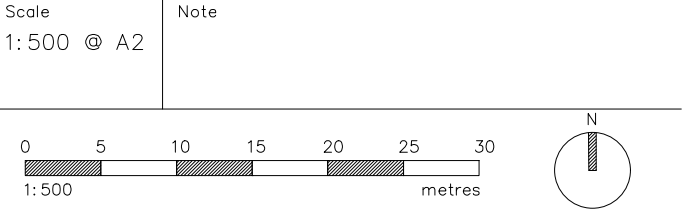


Proposed Block Plan
1:500



2 The Parade, Ash Road, Hartley
Longfield, Kent DA3 8BG
Tel: 01474 703705
www.grahamsimpkinplanning.co.uk
Email: webmail@grahamsimpkinplanning.co.uk

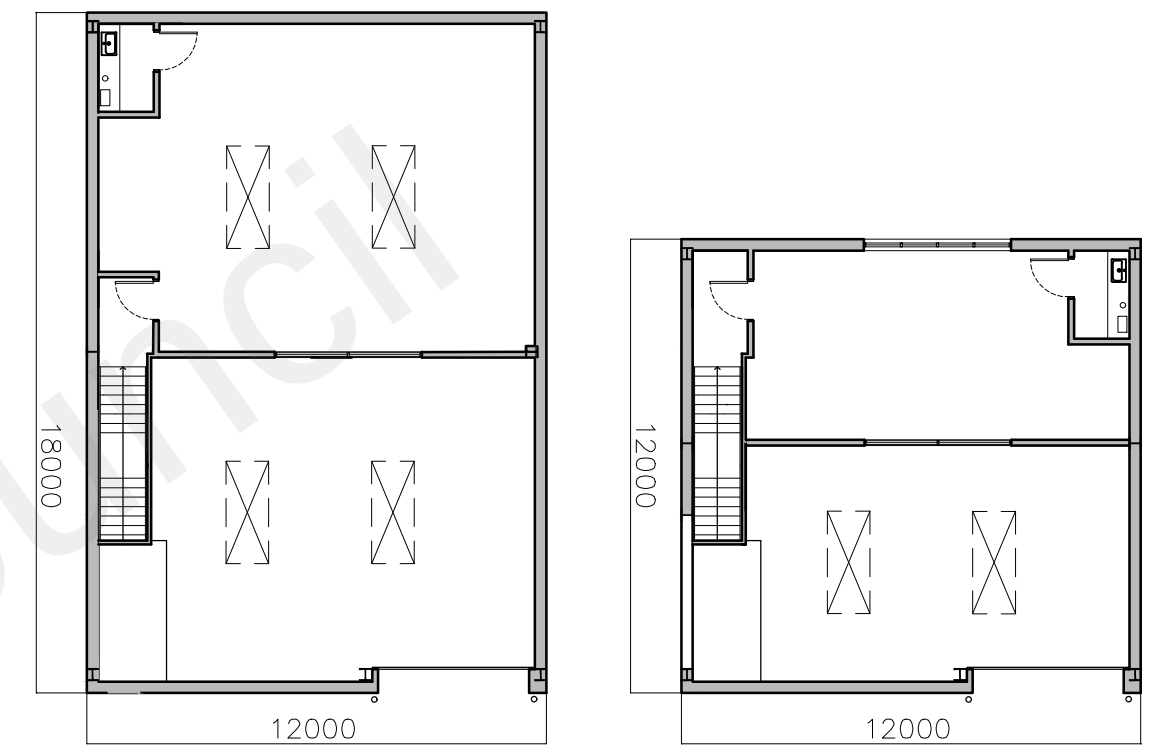
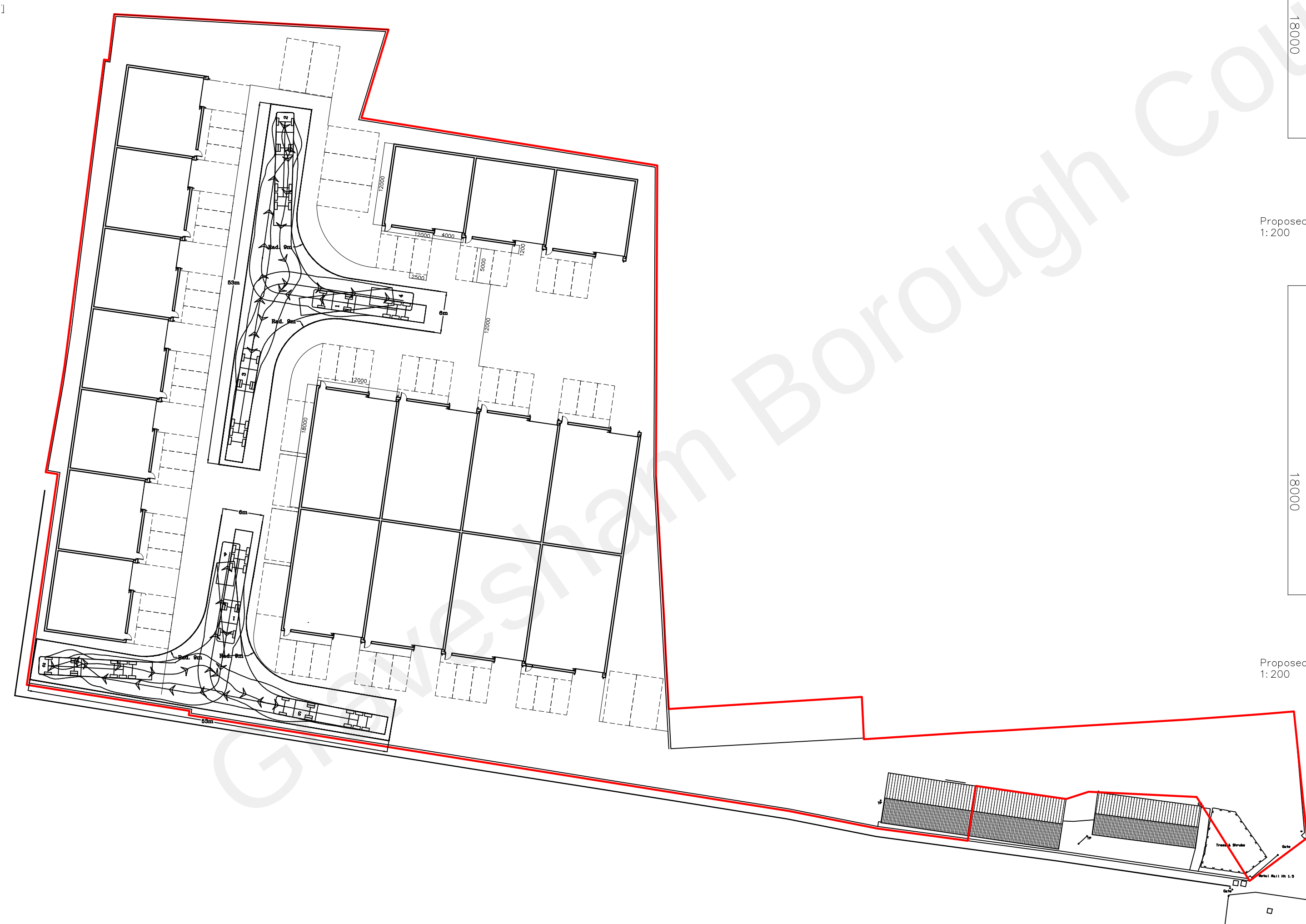
Project Title Land at Wharf Road, Gravesend DA12 2RU		Job No 3169
Drawing Title Proposed Block Plan	Drawing No SK01	Revision
Date 14.02.2021	Drawn by MS	Checked by SC



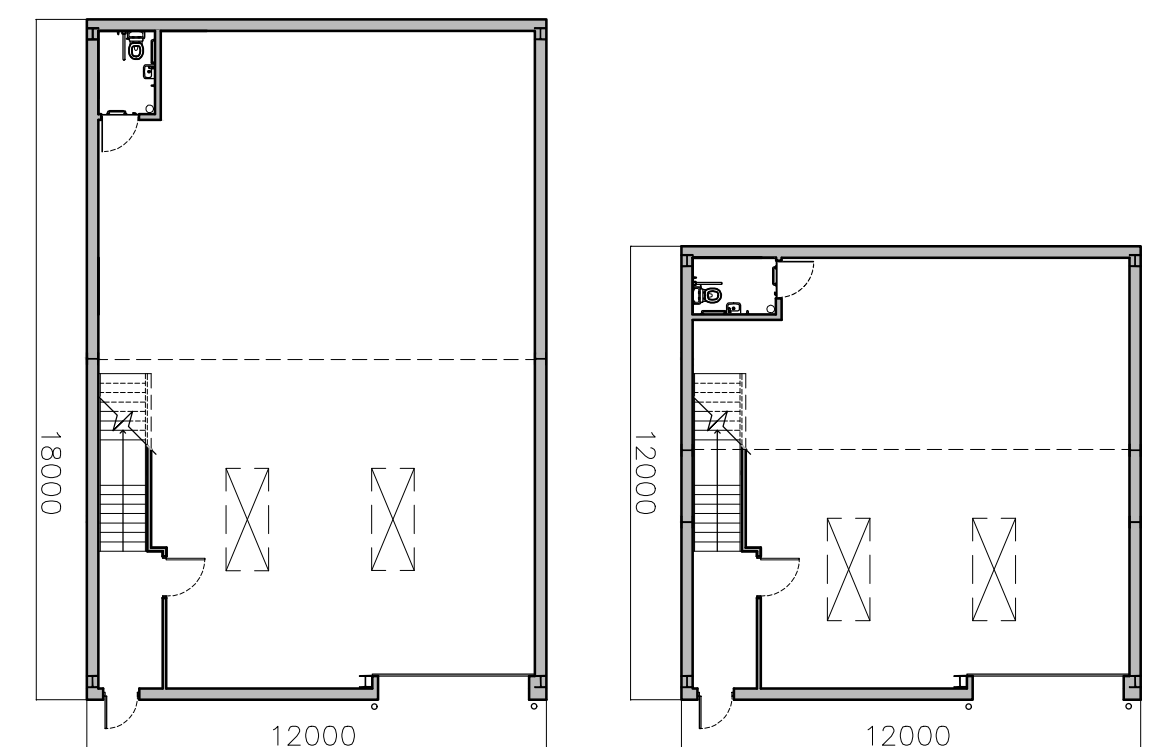
Note

This drawing is protected by copyright and must not be copied or reproduced without the written consent of Graham Simpkin Planning. All dimensions and sizes to be checked on site.

North points are indicative. ©



Proposed Warehouses First Floor Plan
1:200



Proposed Warehouses Ground Floor Plan
1:200



2 The Parade, Ash Road, Hartley
Longfield, Kent DA3 8BG

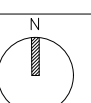
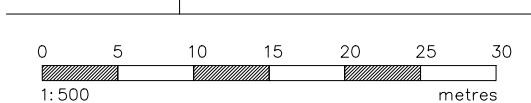
Tel: 01474 703705

www.grahamsimpkinplanning.co.uk
Email: webmail@grahamsimpkinplanning.co.uk

Project Title Land at Wharf Road, Gravesend DA12 2RU		Job No 3169
Drawing Title Proposed Block Plan	Drawing No SK02	Revision
Date 14.02.2021	Drawn by MS	Checked by SC

Scale
1:500 @ A2

Note



Proposed Block Plan
1: 500

APPENDIX THREE

Screening Report by L Brown Associates

Gravesham Borough Council

Mr L Brown BSc MSc, MCIHT CMILT
L Brown Associates Ltd
34 Fallowfield
Chatham
Kent
ME5 0DX
24.09.21
Tel 07709 969 599
Our ref 1275

Chief Planning Officer
Gravesham Borough Council
Civic Centre
Windmill Street
Kent
DA12 1AU

Dear Sir,

**Proposed Redevelopment of Land at Wharf Road, Gravesend, DA12 2RU.
Transportation Appraisal – Highway & Transportation Scope.**

We are writing to you with a short technical note following on from our instruction by our client Feabrex Ltd and his planning consultant GSP to undertake the highway and transportation work.

To date we have walked the various cycle and public footpaths, have also reviewed the consented Canal Basin site that our client also owns. The area in question is set out below and also on drawing SK01 in *Appendix 1*. It covers an industrial area with commercial units providing car repair services, scaffolding services, HGV haulage services to name but a few.



The redevelopment of the site will increase the floor area by approximately 1000sqm and in highway and transportation terms traffic generation and impacts are de minimis. We have provided the evidence base in our technical note below.

From our initial overview the proposal accords with planning policy and para 111 of the NPPF, updated in 2021

The proposal also accords with the Equality Act 2010, in which Gravesham undertook a local plan Core Strategy review in December 2012.

The proposal also accords with the local authority's sentiments in improving the street scene, providing quality commercial units to extend the current employment opportunities in the area and improving the environment along the frontage to the National cycle network.

We trust this submission will reassure your authority that an EIA dealing with the highway and transportation aspects would be disproportionate.

Yours faithfully

A handwritten signature in black ink, appearing to read 'Leslie A Brown', with a stylized flourish at the end.

Mr L Brown

TECHNICAL NOTE - LAND AT WHARF ROAD GRAVESEND

Current Highway Network – Links To the Site.

The local unclassified roads of Ordnance Road, Canal Road and Wharf Road are generally 7.5m wide with a single yellow line prohibiting parking, on street, from Mondays to Saturdays between 8am and 6.30pm.

The primary means of access from the commercial area onto the main classified roads is via the signalised junction of Ordnance Road with Milton Road.



Reviewing the Canal Basin development proposal we note this junction is to be widened on the Ordnance Road arm approach.

Public Rights Of Way – Cycle Routes

We have reviewed the footpath and the National Cycle Network route 1 links that traverse from Canal Basin, Albion Parade to the west to Norfolk Road to the east. The route, which has also been addressed by the Canal Basin developer, is unlikely to be used in the evening during dusk, even with street lighting in place over some of the route. During the site inspection there were a few cyclists and pedestrian on the route during the time of the visit.



The Site

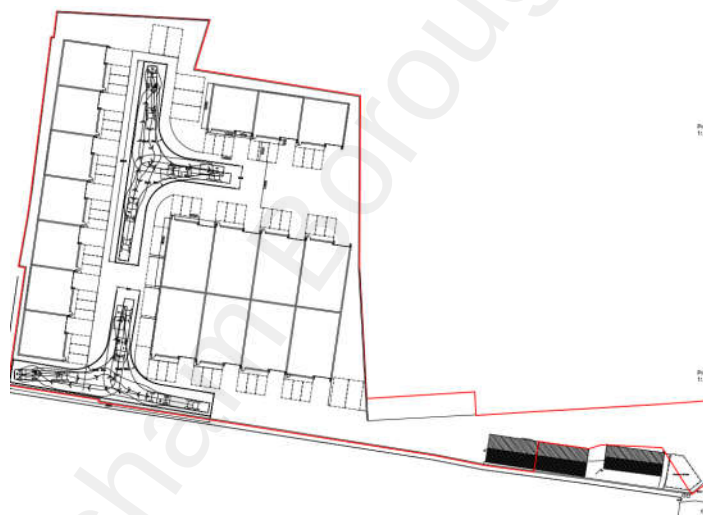
The site has many tenants that operate a commercial primarily industrial Use. The units had many HGV's parked on site and included a haulage contractor. More than one scaffolding company and car repairers. There is open storage of cars and building materials.



The concrete roads that serve the site ensure that operations on site will not take any loose materials onto the public highway but also ensures that access is well maintained.

Development Proposal – Vehicle Trips

Graham Simpkin Planning submitted a pre-app for the scheme. Their drawing SK02 set out a commercial layout that has no open storage but has parking and service vehicle access that accommodated articulated HGV's. The overall increase in the building footprint is 1000 sqm.



In order to determine the net increase in traffic generation a number of exercises has been undertaken to determine the increase in traffic. The assessment has not relied upon the close proximity of the National cycle network to the site.

The trip rates and flows have been taken from 2 sources:-

- 1) The Canal Basin development.
- 2) Commercial Development in Faversham, The shipyard, Upper Brents Industrial Estate ME13 7DZ.

The trip rates and flows are set out in **Appendix 2**. The net increase using the Canal Basin agreed trip rates are as follows:

The following tables set out the trip rates and also the vehicle flows:-

Table 1.1 Vehicle Trip Rates Per 100sqm – Canal Basin.

Peak	IN	Out	Total
AM 0800-0900	0.446	0.098	0.544
PM 1700-1800	0.083	0.404	0.487

Based on the floor areas above (1,000sqm) the vehicle flows are as follows: -

Table 1.2 Vehicle Flows based on 1000 sqm.

Peak	IN	Out	Total
AM 0800-0900	4.46	0.98	5.4
PM 1700-1800	0.83	4.04	4.87

Now using the surveys from the Faversham site the following tables show a small difference. The shipyard site also has electrical and plumbing wholesalers selling to the trade.

Table 1.3 Vehicle Trip Rates Per 100sqm – Shipyard - Faversham.

Peak	IN	Out	Total
AM 0800-0900	0.401	0.215	0.616
PM 1700-1800	0.215	0.401	0.616

Based on the floor areas above (1,000sqm) the vehicle flows are as follows: -

Table 1.4 Vehicle Flows based on 1000 sqm.

Peak	IN	Out	Total
AM 0800-0900	4.013	2.146	6.159
PM 1700-1800	2.146	4.013	6.159

The above vehicle numbers during the peak hour would have no impact upon the signalised junction at Ordnance Road.

Summary & Conclusions

Hence summarising the results above the redevelopment of the site will improve access to the new commercial units, will remove the current open storage on site and may assist in improving the safety and security of the National cycle network, plus public Rights of Way.

The traffic impact is very low and in NPPF terms para 111

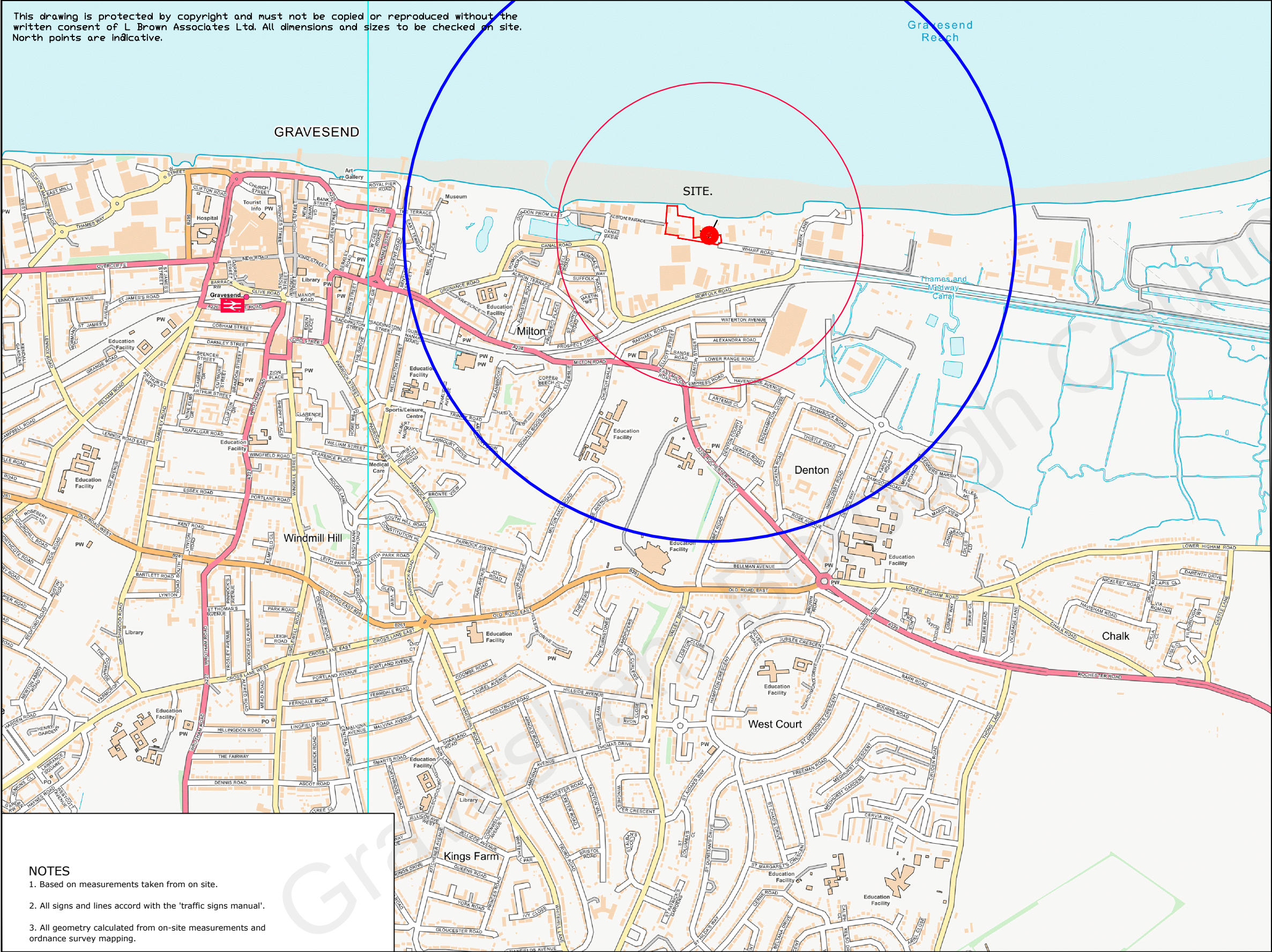
111. Development should only be prevented or refused on highways grounds if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the road network would be severe.

There are no specific highway and transportation aspects of the scheme that would raise any highway objections.

Appendix 1

Location Plan SK01

This drawing is protected by copyright and must not be copied or reproduced without the written consent of L Brown Associates Ltd. All dimensions and sizes to be checked on site. North points are indicative.



NOTES

1. THIS DRAWING IS TO BE READ IN CONJUNCTION WITH ALL RELEVANT ENGINEERS, ARCHITECTS AND SPECIALISTS DRAWINGS AND THE SPECIFICATION.
2. REFER TO PLANNING CONSULTANT'S SUBMISSION.
3. RED AND BLUE LINE BOUNDARIES PLEASE REFER TO PLANNING CONSULTANT'S DRAWINGS. THESE LINES ARE FOR GUIDANCE ONLY.

KEY

-  SITE.
-  PUBLIC RIGHTS OF WAY.
-  BRIDGE.
-  400M WALK DISTANCE.
-  800M WALK DISTANCE.
-  STATION.
-  BUS STOP.

NOTES

1. Based on measurements taken from on site.
2. All signs and lines accord with the 'traffic signs manual'.
3. All geometry calculated from on-site measurements and ordnance survey mapping.

LBA

L BROWN ASSOCIATES LTD

DEVELOPMENT PLANNING, HIGHWAY AND
TRANSPORTATION ENGINEERS
34 Fallowfield, Chatham, Kent, ME5 0DX
Telephone 01634 301082.

Drawing Status:

INFORMATION

Client

FEABREX

Project

LAND AT WHARF ROAD, GRAVESEND,
KENT, DA12 2RU.

Drg Title

LOCATION PLAN.

Drawn/Design
LAB

Checked

LAB

Approved

LAB

Date

15.09.2021

Scales

NTS @ A3

Drg No.

1275 - SK01

Rev

A			LAB	LAB
Rev	Date	Description	Made	Ckd

Appendix 2

Vehicle Trip Rates and Flows

B1 Use Class

Joinery Industrial

TRIP RATE for Land Use 02 - EMPLOYMENT/C - INDUSTRIAL UNIT

TOTAL VEHICLESCalculation factor: **100 sqm**Estimated TRIP rate value per 100 SQM shown in shaded columns **BOLD** print indicates peak (busiest) period

Time Range	ARRIVALS				DEPARTURES				TOTALS			
	No. Days	Ave. GFA	Trip Rate	Estimated Trip Rate	No. Days	Ave. GFA	Trip Rate	Estimated Trip Rate	No. Days	Ave. GFA	Trip Rate	Estimated Trip Rate
06:00 - 06:30												
06:30 - 07:00												
07:00 - 07:30												
07:30 - 08:00												
08:00 - 08:30												
08:30 - 09:00												
09:00 - 09:30												
09:30 - 10:00												
10:00 - 10:30												
10:30 - 11:00												
11:00 - 11:30												
11:30 - 12:00												
12:00 - 12:30												
12:30 - 13:00												
13:00 - 13:30												
13:30 - 14:00												
14:00 - 14:30												
14:30 - 15:00												
15:00 - 15:30												
15:30 - 16:00												
16:00 - 16:30												
16:30 - 17:00												
17:00 - 17:30												
17:30 - 18:00												
18:00 - 18:30												
18:30 - 19:00												
19:00 - 19:30												
19:30 - 20:00												
20:00 - 20:30												
20:30 - 21:00												
21:00 - 21:30												
21:30 - 22:00												
22:00 - 22:30												
22:30 - 23:00												
23:00 - 23:30												
23:30 - 24:00												
Total Rates:		2.028		0		2.08		0		4.108		0

Using a Floor Area of 1000 sqm

	in	out	Total
0800-0900	0.446	0.098	0.544

Veh Flows	4.46	0.98	5.44
-----------	------	------	------

Table 4.2 – Trip Rates per 100sqm – Commercial. The Ship yard Faversham

Peak PERSON	In	Out	Total
AM	0.019	0.028	0.047
PM	0.028	0.019	0.047
VEHICLE TRIP RATES			
AM	0.401	0.215	0.616
PM	0.215	0.401	0.616

For	1000 sqm		
VEHICLE			
AM	4.013	2.146	6.159
PM	2.146	4.013	6.159

	in	out	Total
1700-1800	0.083	0.404	0.487

Veh Flows	0.83	4.04	4.87
-----------	------	------	------