

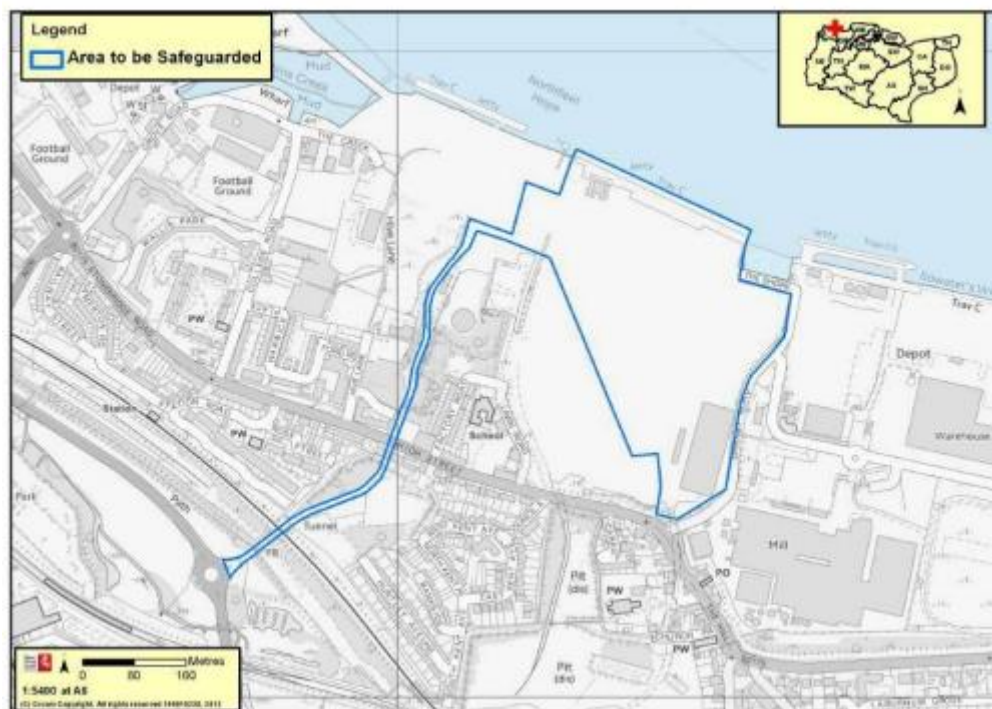
Land to the Northwest Of Factory Road, Northfleet Works, The Shore, Northfleet, Gravesend, Kent

Project/File: 332612492
 Date: 28th July 2025
 Prepared By: K State
 Reviewed By: J Lewis
 Subject: **Policy DM8 Infrastructure Assessment**

1 Introduction

- 1.1 An application was submitted to Grasham Borough Council (GBC) and Ebbsfleet Development Corporation (EDC) in June 2025 for the 'Erection of a workshop (Use Class E(g)(iii)), access, parking, and associated landscaping.', (planning ref: GB/20250550 and EDC/25/0081).
- 1.2 Following receipt of comments from the Port of London Authority on 1st July 2025 in regard to the planning application, Stantec UK Ltd has prepared the below high level Infrastructure Assessment in response to Policy DM8 of the Kent Minerals and Waste Local Plan (2025) (KMWLP). The Port of London Authority comments are provided in **Appendix A**.
- 1.3 The proposed development lies within 250m of safeguarded wharves and minerals infrastructure (Wharf 42 shown below) thus is subject to the requirement under Policy DM8 of the KMWLP. The following assessment has been informed by work undertaken for the other phases of the Harbour Village development.

Site N: Wharf 42, Northfleet



2 Policy DM8 (KMWLP)

2.1 Policy DM8 of the KMWLP is set out below:

Policy DM 8

Safeguarding Minerals Management, Transportation Production & Waste Management Facilities

Planning permission will only be granted for development that is incompatible with safeguarded minerals management, transportation or waste management facilities,

where it is demonstrated that either:

1. it constitutes development of the following nature: advertisement applications; reserved matters applications; minor extensions and changes of use and buildings; minor works; and non-material amendments to current planning permissions; or
2. it constitutes development on the site that has been allocated in the adopted development plan where consideration of the other criteria (1, 3-7) can be demonstrated to have taken place in formulation of the plan and allocation of the site which concluded that the safeguarding of minerals management, transportation, production and waste management facilities has been fully considered and it was concluded that certain types non-mineral and waste development in those locations would be acceptable; or
3. replacement capacity, of the similar type, is available at a suitable alternative site, which is at least equivalent or better than to that offered by the facility that it is replacing; or
4. it is for a temporary period and will not compromise its potential in the future for minerals transportation; or
5. the facility is not viable or capable of being made viable; or
6. material considerations indicate that the need for development overrides the presumption for safeguarding; or
7. It has been demonstrated that the capacity of the facility to be lost is not required.

Replacement capacity must be at least equivalent in terms of tonnage, accessibility, location in relation to the market, suitability, availability of land for processing and stockpiling of waste (and materials/residues resulting from waste management processes) and minerals, and:

- in the case of wharves, the size of the berth for dredgers, barges or ships
- in the case of waste facilities, replacement capacity must be at least at an equivalent level of the waste hierarchy and capacity may be less if the development is at a higher level of the hierarchy

There must also be no existing, planning or proposed developments that could constrain the operation of the replacement site at the required capacity.

Planning application for development within 250m of safeguarded facilities need to demonstrate that impacts, e.g. noise, dust, light and air emissions, that may legitimately arise from the activities taking place at the safeguarded sites would not be experienced to an unacceptable level by occupants of the proposed

development and that vehicle access to and from the facility would not be constrained by the development proposed.

Further guidance on the application of this policy will be included in a Supplementary Planning document.



3 Transport and Highways

- 3.1 Wharf 42 is accessed by the Thames Way tunnel under the rail line (Tunnel TU24). It is also accessed by the commercial (i.e. non passenger) rail line that runs to the east and south of the development site.
- 3.2 Construction access for the proposed workshop will be via Factory Road, which takes access from High Street, Northfleet. This is due to the stage of current phases of Harbour Village, and that Bevans Park recreational open space to the north of the site will likely be constructed before construction commences at the proposed workshop. As such, with the two access points being completely separate, there is no conflict expected between the workshop construction traffic and traffic at Wharf 42.
- 3.3 Similarly, the operational access for the workshop will only be via Factory Road and therefore there will be no conflict between the proposed workshop operational traffic and traffic at Wharf 42.
- 3.4 The access for the proposed workshop does not conflict with the possible operation of the train route either, as no use is made of Church Path Pit.
- 3.5 There are no public rights of way that route through the proposed site.
- 3.6 Use of the river for transportation of goods and waste has not been considered appropriate due to the small scale of the development. Waste is to be collection either via a scrap metal van, or via typical waste removal along Factory Road as set out in the Transport Statement (Stantec, 2025).

4 Obtrusive Lighting

- 4.1 An assessment of obtrusive lighting has been carried out with due regard to the Institution of Lighting Professionals' (ILP) Professional Lighting Guide 04: Guidance on Undertaking Environmental Lighting Impact Assessments (2013) (ILP PLG04) and ILP Guidance Note 01 for the reduction of obtrusive light (2021) (ILP GN01).

Baseline Conditions

- 4.2 The proposed development is located on Factory Road, which is already lit by LED street lights, including a street light located immediately outside of the site. This identifies that the baseline lighting conditions are already lit and residential in nature.
- 4.3 The existing working areas around Wharf 42 appear to be lit with a mix of high mast style floodlights (with 2 notable gantry towers), 15m height, coupled with lower, <15m height, column mounted floodlights, streetlights, and building mounted floodlights and bulkheads. Lighting appears to be greatest around the quayside, staff carparks and Tarmac building. The southern access road to Wharf 42 is unlit and currently undergoing construction works as part of other phases.

Impact Assessment

- 4.4 The proposed workshop is a low sensitivity receptor. Working during times of darkness will only occur during the winter months when the sun sets before the end of standard daytime working hours.



- 4.5 Whilst the existing lighting within Wharf 42 is understood to generate a higher than desirable proportion of upward light, this forms the baseline condition. This could be raised as a concern regardless of the proposed developments with guidance produced by the Department of Environment, Food and Rural Affairs (DEFRA) in April 2006, on Section 101 to 103 of the CNEA, extending the duty on local authorities to ensure their areas are checked periodically for existing sources of statutory nuisances. Noting that more sensitive residential receptors already exist along Factory Road, adjacent the site.
- 4.6 If it is considered necessary, lighting solutions which avoid and mitigate these issues, whilst maintaining the functionality could be developed for Wharf 42.
- 4.7 The extent of potential impact from lighting of the operation of Wharf 42 on the proposed workshop is therefore considered minimal.

5 Air Quality and Dust

- 5.1 A Source-Pathway-Receptor assessment has been undertaken in accordance with the methodology contained within the Institute of Air Quality Management Mineral Dust Guidance (IAQM, 2016¹) to identify the risk of dust impacts from the Lafarge Bulk Aggregates Import Terminal (BAIT) located within the Safeguarded Wharf 42. Meteorological data has been taken from the Gravesend Broadness meteorological station, which is considered the most representative station to the site. The Gravesend Broadness meteorological station permanently closed in 2018, therefore available meteorological data for 2017 has been used to inform the Dust Risk assessment.

Dust Risk Assessment - Lafarge Bulk Aggregates Import Terminal (BAIT)

- 5.2 The Lafarge BAIT is located to the east of the site within the Safeguarded Wharf 42 area. The following sources of dust have been considered in the assessment:
- Sea dredged aggregate and crushed rock off loaded by self-discharging boat;
 - Screening and storage of crushed rock, sand, and gravel;
 - Conveyor belts;
 - Material moved around site by front end loader;
 - Crushing of rocks;
 - Rinsing of crushed rock; and
 - Out loading of material to road, rail or barge.
- 5.3 The imported marine aggregates – sand and gravel – to the BAIT have a high moisture content which reduces the potential for dust and/or PM₁₀ emissions. However, due to the quantum and number of activities, the residual source emissions from the BAIT are considered large.

¹ Institute of Air Quality Management (2016). Guidance on the Assessment of Mineral Dust Impacts for Planning v1.1.
https://iaqm.co.uk/text/guidance/mineralsguidance_2016.pdf



- 5.4 At the closest point the BAIT is located 200 m east of the site boundary and categorised as intermediate. Based on the frequency of potentially dusty winds (>5 m/s) towards the site (north, northeast and east) occur for less than 5% of the time and categorised as 'infrequent'. The pathway effectiveness is therefore ineffective and dust impact risk is low.
- 5.5 It is considered that the BAIT would have the potential to represent negligible impact on the amenity of receptors within the proposed development. This effect is considered 'not significant' and would not result in the occupiers experiencing an unacceptable level of disamenity impact due to dust deposition.

PM₁₀ Impacts

- 5.6 The IAQM Guidance states that: *"If the long term background PM₁₀ concentration is less than 17 μ g/m³ there is little risk that the Process Contribution (PC) would lead to an exceedance of the annual-mean objective."*
- 5.7 The DEFRA mapped 2025 PM₁₀ background concentrations at the site are predicted to be 11.8 μ g/m³ and therefore below 17 μ g/m³. The ZG3 monitored annual mean PM₁₀ concentrations, which are influenced by the current operations in the Northfleet Industrial Area, are also below 40 μ g/m³, recording an annual mean concentration of 18.2 μ g/m³ in 2023.
- 5.8 It is therefore considered that the PM₁₀ annual mean objective would not be exceeded at the Site because of the nearby industrial sources. Therefore, the proposed development would not experience an unacceptable level of impact from PM₁₀.

Meeting of PM_{2.5} Targets

- 5.9 Background concentrations of PM_{2.5} at the Site in 2025 are well below the annual mean concentration target of 10 μ g/m³ which is to be achieved by 2040. The estimated background concentration at the Site in 2025 is 7.1 μ g/m³.
- 5.10 The proposed development is set back from the Safeguarded areas which could potentially impact PM_{2.5} concentrations within the Site, and the proposed development itself is not expected to create significant emissions of PM_{2.5}.
- 5.11 As such, it is expected that the 2040 PM_{2.5} target of 10 μ g/m³ will be achieved at the Site.

6 Acoustics

- 6.1 A Noise Impact Assessment (Stantec, 2025) has been prepared for the planning application, which included an acoustic survey undertaken on site in March 2025.
- 6.2 Whilst noise from Wharf 42 was not specifically identified, it would have been picked up as the background noise in the sound survey.
- 6.3 It is noted that background noise levels are acceptable to existing residents along Factory Road, which are classed as having higher sensitivity compared to occupiers of the proposed workshop.
- 6.4 Therefore, the noise from Wharf 42 is expected to have no impact on the proposed workshop, especially due to the low sensitivity of the occupiers.



7 Conclusions

- 7.1 From the assessment above, it is concluded that the occupants of the site would not experience unacceptable levels of noise, dust, light and air emission impacts, and that vehicle access to Wharf 42 would not be constrained by the proposed development.
- 7.2 Therefore, the proposed workshop at Factory Road is considered acceptable in line with the requirements of Policy DM8 of the KMWLP.



Appendix A Port of London Authority Comments





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01 July 2025

Port of London Authority Response (DC 242) Plan ref 20250550 Land to the north west of Factory Road, Northfleet, Gravesend DA11 9HH.

Dear Amanda

Thank you for consulting the Port of London Authority (PLA) on the above application to erect a workshop (Use Class E(g)(iii), access, parking and associated landscaping. We have now had the opportunity to review the submitted report and have the following comments to make.

Firstly, we note the Environment Agency (EA) objection to the proposal as there is insufficient information to demonstrate that the rise of pollution to controlled waters can be appropriately managed. We support this view as the key interest for the PLA is in the health of the river, including water quality. Any new or amended outfall into or from the River Thames will require a River Works Licence with the PLA and the PLA's Statutory Consents and Compliance team should be contacted at lic.app@pla.co.uk to discuss further.

If the above objection can progress to the satisfaction of the EA, we would also note the close proximity of the site to safeguarded wharves, as shown in the Gravesham Local Plan Core Strategy and Policies Map (Map 1). The proposal must consider Policies CS07 Economy, Employment and Skills and Policy CS11 Transport of the Local Plan, to support the continued use of the River Thames for commercial transport, whilst safeguarding and maximising the use of the existing commercial wharves. Although we acknowledge that the warehouse use is light industrial, there is no evidence within the application to show that the use of the river has been considered for the transportation of goods and waste throughout construction and/or operation. Consideration should also be given to Policy DM8 (Safeguarding Minerals Management, Transportation Production & Waste Management Facilities) of the Kent Minerals and Waste Local Plan.

I hope these comments are of assistance and if there is anything further that we can assist with, please get in touch.

Yours sincerely



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