

**THE TOWN AND COUNTRY PLANNING (ENVIRONMENTAL IMPACT ASSESSMENT) REGULATIONS
2017 SCREENING MATRIX**

1. CASE DETAILS			
Case Reference	20230909	Brief description of the project / development	Construction of a Green Hydrogen Electrolyser and associated infrastructure.
Appellant	Rebecca Little		
LPA	Gravesham Borough Council		
2. EIA DETAILS			
Is the project Schedule 1 development according to Schedule 1 of the EIA Regulations?		No	
If YES, which description of development (THEN GO TO Q4)		N/A	
Is the project Schedule 2 development under the EIA Regulations?		Yes	
If YES, under which description of development in Column 1 and Column 2?		3(b) Energy industry	
Is the development within, partly within, or near a 'sensitive area' as defined by Regulation 2 of the EIA Regulations?		Yes	
If YES, which area?		The Thames Estuary and Marshes Special Protection Area and Ramsar site is located in close proximity to both the south and east of the site.	
Are the applicable thresholds/criteria in Column 2 exceeded/met?		Yes	
If yes, which applicable threshold/criteria?		The development is more than 1 hectare of urban development which is not dwelling house development (Total area approx. 2.2 hectares).	
3. LPA/SOS SCREENING			
Has the LPA or SoS issued a Screening Opinion (SO) or Screening Direction (SD)? (In the case of Enforcement appeals, has a Regulation 37 notice been issued)		No	
If yes, is a copy of the SO/SD on the file?		N/A	
If yes, is the SO/SD positive?		N/A	
4. ENVIRONMENTAL STATEMENT			
Has the appellant supplied an ES for the current or previous (if reserved matters or conditions) application?		No	

WHEN COMPLETING THIS DOCUMENT IN RELATION TO AN ENFORCEMENT APPEAL, THE UNDERSIGNED OFFICER HAS HAD REGARD TO THE PROJECT AS ALLEGED IN THE RELEVANT ENFORCEMENT NOTICE WHEN REFERRING TO THE PROJECT / DEVELOPMENT.

A Screening Criteria Question	B Response to the Screening Criteria Question in Column A (Yes/No and explanation of reasons)		C Is a Significant Effect Likely? (Yes/No and explanation of reasons (nb if the answer in Column B is 'No', Column C is not applicable))	
	Briefly explain reasons and, if applicable and/or known, include name of feature(s) and proximity to site(s)		Is a significant effect likely, having regard particularly to the magnitude and spatial extent (including population size affected), nature, intensity and complexity, probability, expected onset, duration, frequency and reversibility of the impact and the possibility to effectively reduce the impact? If the finding of no significant effect is reliant on specific features or measures of the project envisaged to avoid, or prevent what might otherwise have been, significant adverse effects on the environment these should be identified in bold .	
5. NATURAL RESOURCES				
5.1 Will construction, operation or decommissioning of the project involve actions which will cause physical changes in the topography of the area?	No	The area upon which the development would be undertaken is a flat, hard surfaced area which would not require level changes.	No	N/A
5.2 Will construction or operation of the project use natural resources above or below ground such as land, soil, water, materials/minerals or energy which are non-renewable or in short supply?	Yes	The proposals will use water as a natural resource.	Yes	The applicants have stated that the levels would be unlikely to be significant enough to cause a significant impact on the environment. However, no detail has been provided on the source of the water or the consumption levels. Given that the hydrogen facility would be used for purposes of industrial paper mill, there is potential for significant impact on the natural water resource.
5.3 Are there any areas on/around the location which contain important, high quality or scarce resources which could be affected by the project, e.g. forestry, agriculture, water/coastal, fisheries, minerals?	Yes	River Thames	Yes	Natural England have advised that there are potential likely significant effects on statutorily designated nature conservation sites or landscapes and further assessment is required.

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6. WASTE		
6.1 Will the project produce solid wastes during construction or operation or decommissioning?	No Applicants EIA Screening Letter confirms development would not produce waste products.	No N/A
7. POLLUTION AND NUISANCES		
7.1 Will the project release pollutants or any hazardous, toxic or noxious substances to air?	Yes The cover letter states that the development would not produce waste products of pollution. However, upon receipt of further information the planning agent confirmed that the normal use emission rates to the air would be as follows: Hydrogen 0.13kg/h Oxygen 2007 Kg/h Nitrogen 24.19kh/h	No The site is in an Air Quality Management Area. Following further details submitted on Air Quality the GBC Environmental Protection Team have not requested an air quality assessment be submitted for further approval.
7.2 Will the project cause noise and vibration or release of light, heat, energy or electromagnetic radiation?	Yes An Acoustic Impact Study has been submitted which concluded that Noise impacts would not be significant and specific mitigation measures would not be required to reduce sound levels.	No KCC biodiversity advise that due to the lack of information, regarding noise, vibration, disturbance, they are unable to assess if the development is likely to have a significant impact on biodiversity. But advise that if GBC are satisfied there would be no noise disturbance that there would likely be no significant impacts on designated sites. GBC Environmental Protection have advised that they raise no concerns regarding the submitted Acoustic Impact Study

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7.3 Will the project lead to risks of contamination of land or water from releases of pollutants onto the ground or into surface waters, groundwater, coastal waters or the sea?	Yes	Geo Environmental Desk Study date 09/06/2023 has been submitted. The report concludes that due to past history of contaminative uses on the application site and also the adjacent site and its location in term of the aquifer and shallow water table, the site presents a moderate to high risk of potential mobile contaminants.	Yes The GBC Environmental Protection Team have advised that further investigation and monitoring would be required. In addition, a detailed Unexploded Ordnance (UXO) risk assessment has been commissioned (Appendix D of the Desk Study). This places the site as Low to Medium risk of UXO and therefore a UXO Risk Management Plan is recommended and should be undertaken prior to any intrusive groundworks taking place.
7.4 Are there any areas on or around the location which are already subject to pollution or environmental damage, e.g. where existing legal environmental standards are exceeded, which could be affected by the project?	Yes	Air Quality Management Area	No The site is in an Air Quality Management Area. Following further details submitted on Air Quality the GBC Environmental Protection Team have not requested an air quality assessment be submitted for further approval.
8. POPULATION AND HUMAN HEALTH			
8.1 Will there be any risk of major accidents (including those caused by climate change, in accordance with scientific knowledge) during construction, operation or decommissioning?	Yes	Hydrogen is a hazardous substance.	Yes The Health and Safety Executive have advised on Town and Country Planning (Environmental Impact Assessment) Regulations 2017, Regulation 4(4) - the vulnerability of the proposed development to major accidents relevant to the development. They have advised that an application for Hazardous Substance Consent may be required. They have also advised that there is a requirement to notify the HSE of a pipeline route before construction will apply and Control of Major Accident Hazard (COMAH) Regulations 2015, that legislation will apply.

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			To date an application for Hazardous Substance Consent has not been submitted and so there is a likely risk of major accidents.
8.2 Will the project present a risk to the population (having regard to population density) and their human health during construction, operation or decommissioning? (for example due to water contamination or air pollution)	Yes	There are nearby dwellinghouses and people working in the industrial facilities nearby.	Yes There are no concerns regarding water contamination and air quality as described in part 7. However, as per part 8.1 there is potential risk of accidents, which given the nearby dwellinghouses particularly at clifftop, could be impacted.
9. WATER RESOURCES			
9.1 Are there any water resources including surface waters, e.g. rivers, lakes/ponds, coastal or underground waters on or around the location which could be affected by the project, particularly in terms of their volume and flood risk?	Yes	River Thames, Ground Water Protection Zone 2.	Yes Flood Risk due to proximity to the River is a concern. No Flood Risk Assessment has been provided. The KCC Flood Risk Officer has advised that Flood Risk assessment would be required to assess potential impacts and appropriate mitigation.
10. BIODIVERSITY (SPECIES AND HABITATS)			
10.1 Are there any protected areas which are designated or classified for their terrestrial, avian and marine ecological value, or any non-designated / non-classified areas which are important or sensitive for reasons of their terrestrial, avian and marine ecological value, located on or around the location and which could be affected by the project? (e.g. wetlands, watercourses or other water-bodies, the coastal zone, mountains, forests or woodlands, undesignated nature reserves or parks. (Where designated indicate level of designation	Yes	Swanscombe Peninsula SSSI, Thames Estuary and Ramsar Sites, Thames Estuary and Marshes SPA.	It is Natural England's advice, on the basis of the material supplied with the consultation, that there are potential likely significant effects on statutorily designated nature conservation sites or landscapes and further assessment is required.

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(international, national, regional or local))).				
10.2 Could any protected, important or sensitive species of flora or fauna which use areas on or around the site, e.g. for breeding, nesting, foraging, resting, over-wintering, or migration, be affected by the project?	Yes	Thames River	Yes	Insufficient information has been submitted to assess whether protected species are likely to be affected. KCC Biodiversity are unable to conclude that there will not be a likely significant impact upon the designated sites. Therefore, an EIA for ecology may be required.
11. LANDSCAPE AND VISUAL				
11.1 Are there any areas or features on or around the location which are protected for their landscape and scenic value, and/or any non-designated / non-classified areas or features of high landscape or scenic value on or around the location which could be affected by the project? ¹ Where designated indicate level of designation (international, national, regional or local).		River Thames Swanscombe Peninsula Site of Special Scientific Interest	No	Existing Industrial Use and low scale form of construction.
11.2 Is the project in a location where it is likely to be highly visible to many people? (If so, from where, what direction, and what distance?)	Yes	River Thames	No	Existing Industrial Use and low scale form of construction.

¹ See question 8.1 for consideration of impacts on heritage designations and receptors, including on views to, within and from designated areas.

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12. CULTURAL HERITAGE/ARCHAEOLOGY				
12.1 Are there any areas or features which are protected for their cultural heritage or archaeological value, or any non-designated / classified areas and/or features of cultural heritage or archaeological importance on or around the location which could be affected by the project (including potential impacts on setting, and views to, from and within)? Where designated indicate level of designation (international, national, regional or local).	No	N/A	No	N/A
13. TRANSPORT AND ACCESS				
13.1 Are there any routes on or around the location which are used by the public for access to recreation or other facilities, which could be affected by the project?	No	N/A	No	N/A
13.2 Are there any transport routes on or around the location which are susceptible to congestion or which cause environmental problems, which could be affected by the project?	No	N/A	No	N/A
14. LAND USE				
14.1 Are there existing land uses or community facilities on or around the location which could be affected by the project? E.g. housing, densely populated areas, industry / commerce, farm/agricultural holdings, forestry, tourism, mining, quarrying, facilities	No	The site has an existing industrial use and the Green Hydrogen facility would support this.	No	N/A

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relating to health, education, places of worship, leisure /sports / recreation.				
14.2 Are there any plans for future land uses on or around the location which could be affected by the project?	Yes	Site Forms part of Opportunity Area 1 – Northfleet Embankment & Swanscombe Peninsula East Opportunity Area. Sub Area 1.7 (Kimberly Clark Site), is occupied by the Tissue Mill and associated building, with use expected to continue beyond plan period. The Council will also support the extension of a heavy rail connection with the Lafarge Tarmac site (in sub-area 1.5) to allow Kimberly Clark and the Northfleet Embankment East Regeneration Area access to the North Kent and High Speed railway lines.	No	Proposed development would be retained to the industrial site and would not overlap.
15. LAND STABILITY AND CLIMATE				
15.1 Is the location susceptible to earthquakes, subsidence, landslides, erosion, or extreme /adverse climatic conditions, e.g. temperature inversions, fogs, severe winds, which could cause the project to present environmental problems?	Yes	The site is besides a cliff edge which would be subject to landslides.	Yes	Insufficient information has been provided as to the potential impact in terms of safety should landslides from the cliff edge occur.
16. CUMULATIVE EFFECTS				
16.1 Could this project together with existing and/or approved development result in cumulation of impacts together during the construction/operation phase?		Sub area 1.8 Northfleet Embankment East Regeneration Area nearby.	Yes	As per part 8, there is potential for harm to human health from major accidents. Part 7 also indicates that there may be some risk of land contamination and UXO impacts which could impact the health and safety of the population. Further information is required to address this.

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17. TRANSBOUNDARY EFFECTS		
17.1 Is the project likely to lead to transboundary effects? ²	No	No N/A

² The Regulations require consideration of the transboundary nature of the impact. Due to the England's geographical location the vast majority of TCPA cases are unlikely to result in transboundary impacts.

18. CONCLUSIONS – ACCORDING TO EIA REGULATIONS SCHEDULE 3**19. SCREENING DECISION**

If a SO/SD has been provided do you agree with it?	No
Is it necessary to issue a SD?	Yes
Is an ES required?	Yes

20. ASSESSMENT (EIA REGS SCHEDULE 2 DEVELOPMENT)**OUTCOME**

Is likely to have significant effects on the environment	ES required	☒
<u>Not</u> likely to have significant effects on the environment	ES not required	
More information is required to inform direction	Request further info	

21. REASON FOR SCREENING

At the request of the applicant.

NAME	Lisa Williams
DATE	05/12/2023