

Our Ref: 20/010/GM/22/046

Your Ref:

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



For the attention of Mr P Price

13 December 2022

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Dear Peter,

Planning Application Reference 20220733 – Response to Air Quality Comments

I am writing on behalf of our client FM Conway Limited to address the consultation response received from Gravesham Borough Council's (GBC) Environmental Protection Team dated 16 September 2022.

The consultation response has been reviewed by Tetra Tech (formerly WYG) who undertook the original Air Quality and Odour Assessment which was submitted alongside the planning application for the development.

Attached to this letter is a Technical Note produced by Tetra Tech which addresses the key points raised within the consultation response received from GBC's Environmental Protection Team. This includes additional air quality modelling using alternative meteorological data and clarification of the air quality model inputs.

The additional modelling has demonstrated that the predicted odour effects at the nearby sensitive receptors are negligible. This is no change from the previous assessment and it is therefore concluded that the proposed development is compliant with Environment Agency Guidance H4 Odour Management (March 2011) and the latest Institute of Air Quality Management (IAQM) Guidance on the Assessment of Odour for Planning (July 2018). It is also demonstrated that the existing odour control measures at the site, implemented in 2018 are appropriate, as evidenced by the absence of any odour complaints during the last 4 years following the installation of new carbon filters. It is concluded, therefore, that these measures will remain appropriate in light of the proposed development.

With respect to air quality, the mitigation measures that the applicant has installed at the site have resulted in an improvement to local air quality since 2018. The applicant is also committed to the implementation of sustainability initiatives including a new cycle to work scheme and for all office-based staff to use zero emissions travel by the end of 2025. The implementation of these sustainability measures will positively contribute towards helping GBC achieve their goal of improving air quality in the locality.

In respect of the above, it is considered that given the lack of evidence to the contrary, the Proposed Development is unlikely to result in any unacceptable increase in odour or air quality emissions and is



compliant with UK legislation governing air quality and odour. On this basis, therefore, there is no justifiable reason why the Proposed Development should be refused on air quality or odour grounds.

I trust that the attached information is sufficient for your needs, however, should you have any questions, please do not hesitate to contact me.

Yours sincerely,



George Massingham BSc (Hons) AssocRTPI
CONSULTANT