

National Grid Cable Tunnel Replacement Project

Environmental Statement Volume VI Appendix 4.1 EIA Screening Opinions

December 2023

Gravesham Borough Council



Application: 20230668

**TOWN AND COUNTRY PLANNING, ENGLAND
THE TOWN AND COUNTRY PLANNING (ENVIRONMENTAL IMPACT ASSESSMENT)
(ENGLAND AND WALES) REGULATIONS 2011**

SCREENING OPINION UNDER REGULATION 15

To: **Kate McGregor**
1 - 3 Strand
London
WC2N 5EH

TAKE NOTICE that **GRAVESHAM BOROUGH COUNCIL**, as Local Planning Authority, under the Town and Country Planning Act hereby determines that the development referred to in the letter received on 22nd June 2023 does constitute EIA development and therefore an Environmental Impact Assessment is required. The notice relates to land situated at

Eastcourt Marshes Electricity Substation
Mark Lane
Gravesend
Kent
DA12 2HR

and being **Request for a screening opinion in accordance with The Town and Country Planning Act (Environmental Impact Assessment) Regulations 2017 in respect of the one new shaft headhouse and one new cable sealing end compound.**

GRAVESHAM BOROUGH COUNCIL MAKES THE FOLLOWING COMMENTS :-

Given the nature of the development, the location and sensitivity of the area and the likely potential impact outlined in respect of biodiversity and ecology, geology and hydrology, noise and vibration, heritage and archaeology, landscape/townscape and visual effects, transport and access and cumulative impacts it is considered that the proposal would be likely to have a significant impact on the environment. Gravesham Borough Council therefore concludes that the development is EIA development and that an EIA is therefore required.

Your attention is drawn to the following informatives

INFORMATIVES:-

1 INFORMATION FOR THE APPLICANT

The Delegated Report and Appendix A: Screening Matrix provide full details of how the decision was made. They can be found at www.gravesham.gov.uk/planning-search by entering the planning application reference number.

2 SUBMITTED PLANS & DOCUMENTS

For the avoidance of doubt, the plans and documents upon which this decision is made comprise:

- Covering Letter from the National Grid dated 2 June 2023; and
- TKRE Cable Tunnel Replacement Project Environmental Screening Report, June 2023 prepared by AECOM Limited.

3 STATEMENT OF POSITIVE AND PROACTIVE APPROACH TO DECISION-MAKING

In accordance with Article 35 (2) of the Town and Country Planning (Development Management Procedure) (England) Order 2015 (as amended), and paragraph 38 of the National Planning Policy Framework (NPPF) 2021, the Local Planning Authority has approached the assessment and determination of this application in a positive and creative way and, where appropriate, has worked pro-actively with the applicant to secure a development that is sustainable and that improves the economic, social and environmental conditions of the area, and that is in accordance with the Development Plan for the area.

Dated: 3 August 2023

Civic Centre
Windmill Street
Gravesend
Kent
DA12 1AU

Wendy Lane MRTPI
Assistant Director (Planning)
Planning Service

Delegated Report

Planning Application

Application no:	20230668
Location:	Eastcourt Marshes Electricity Substation Mark Lane Gravesend Kent
Description:	Request for a screening opinion in accordance with The Town and Country Planning Act (Environmental Impact Assessment) Regulations 2017 in respect of one new shaft headhouse and one new cable sealing end compound.
Applicant:	Kate McGregor
Site Visit Date:	Not required for a screening opinion application

Proposal

This application comprises a request for a screening opinion in respect of one new shaft headhouse and one new cable sealing end compound which is one part of the Tilbury to Grain and Tilbury to Kingsnorth (TKRE) Cable Tunnel Replacement Project.

For the TKRE Cable Tunnel Replacement Project a new bored tunnel under the River Thames is proposed to house new cross linked polyethylene (XLPE) cables. In addition, associated new infrastructure is proposed either side of the River Thames in Tilbury and Gravesend comprising:

- Two new headhouses;
- Two Sealing End Compounds (SECs); and
- Overhead line re-stringing to connect the existing overhead lines to each of the new SECs.

Four individual EIA screening opinion requests have been submitted to the relevant authorities with respect to the elements of the TKRE Cable Tunnel Replacement Project which fall within their jurisdiction. For completeness, the relevant authorities and the relevant elements of the project within their jurisdiction comprises of:

- Gravesham Borough Council - EIA Screening under the Town and Country Planning (Environmental Impact Assessment) Regulations 2017 for **one new shaft headhouse and one new cable sealing end compound**;
- Thurrock Council - EIA Screening under the Town and Country Planning (Environmental Impact Assessment) Regulations 2017 for **one new shaft headhouse and one new cable sealing end compound**;
- Marine Management Organisation (MMO) - EIA Screening under The Marine Works (Environmental Impact Assessment) Regulations 2007 for **the new bored tunnel**; and
- Department for Energy Security and Net Zero (DESNZ) - EIA Screening under The Electricity Works (Environmental Impact Assessment) (England and Wales) Regulations 2017 for **the overhead line modification works**.

The site location plan as shown in the Environmental Screening Report is as follows:



The EIA Screening Boundary as shown in the Environmental Screening Report is as follows and shows the development proposed:



LEGEND

- EIA Screening Boundary
- Existing Pylons to be Removed
- Existing Pylons to be Removed / Refurbished / Replaced
- Existing Pylons to be Retained
- Indicative Tunnel Alignment
- Existing Overhead Line to be Permanently Diverted
- New Overhead Line
- Permanent Development
- Temporary Working Area

It is stated in the submitted report that the area where the Gravesend Headhouse and SEC is to be located is on land owned by National Grid.

Submitted Documents/Plans

- Covering Letter from the National Grid dated 2 June 2023; and
- TKRE Cable Tunnel Replacement Project Environmental Screening Report, June 2023 prepared by AECOM Limited.

Consultations, Publicity and Representations

Consultees

Internal

GBC Environmental Protection

The EIA screening opinion has been reviewed with regards to the chapters that fall within the remit of Environmental Protection namely, noise and vibration, air quality and geology and hydrology covering contaminated land) and the impact on the Gravesham Borough Council area:

Noise and vibration:

It is anticipated that there will be an impact from noise and vibration during both the construction and operational phases unless appropriate mitigation measures are put in place. Sensitive receptors (daytime use only) are located close to the development site to the west with residential being much further away to the southeast, so not impacted as such. This will be set out in greater detail in the Environmental Report which will accompany the planning application with appropriate mitigation any impact will be minimised and not significant. This approach is acceptable.

Air Quality:

There are likely to be dust emissions during the construction phase which will impact on human health, local amenity, and also ecological receptors. Mitigation will be needed and guidance from the Institute of Air Quality Management (IAQM) has been referred to. There is unlikely to be any impact on air quality during the operational phase. The construction phase impacts relating to dust can be addressed by a suitably detailed Construction Environmental Management Plan (CEMP) which can be submitted with the full planning application (or placed as a condition on planning permission should it be granted). It is not considered that any further work on air quality impact per se is required.

Geology and Hydrology:

This section covers potentially contaminated land. There is the potential for contaminative uses to have been present in the area of the Gravesend site and as such further investigation is required. A staged approach to the investigation is proposed in section 3.8.21 (including an updated Phase 1 Desk Top Study with a risk assessment and conceptual site model). This is acceptable and in line with our usual requirements. The screening assessment advises that once the Phase 1 study is updated, it's likely that mitigation can be addressed via the CEMP.

GBC Highways

Fortunately, this proposal has most of the work being conducted from the Tilbury side of the river, with the spoil from one shaft and the tunnel being removed via the north portal. Similarly, materials for construction of the shaft and tunnel will arrive from the north as will the Tunnel Boring Machine.

The only traffic generation in Gravesend will be in the construction of the southern shaft and the necessary buildings and pylons to receive the cables and connect to the overhead wire system in Gravesend. Plus, the removal of the Tunnel Boring Machine. This level of traffic would not be considered significant, but could involve some abnormal loads which will require careful management.

Given the anticipated time of construction, there could be conflict with the redevelopment at the Canal Basin and Albion Waterside. (Application 20210270), as well as the Lower Thames Crossing and the applicant will need to carefully manage the development and its deliveries and waste removal to minimise any adverse impacts that may be caused by delays outside his control.

It would be desirable that no HGV movements should take place during school arrival and leaving times at Chantry Community Academy due to the age of the children, and parental parking.

External

KCC Biodiversity

We have reviewed the submitted information in regard to determining if an environmental impact assessment (EIA) will need to be carried out and advise there are likely to be significant impacts. Therefore, an EIA for ecology is required.

Schedule 1

Under the Town and Country Planning (EIA) Regulations 2017, developments falling within Schedule 1 always require an EIA and are referred to as 'Schedule 1' developments.

EIA Screening

If the development falls within the selection criteria for a 'schedule 2' development of the Town and Country Planning (Environmental Impact Assessment) Regulations 2017, then it needs to be determined whether the proposal is situated within a 'sensitive area' and/or whether it is likely to have significant effects on the environment. Sensitive areas (as identified under Section 2(1), include the following ecologically designated sites: Site of Special Scientific Interest (SSSI), European Sites (Special Protection Areas (SPA), Special Areas of Conservation (SAC) and Ramsar Sites)). If the proposed development is located in, partly in, or has the potential to have any negative effect on these sites, then an assessment will be required. The regulations also include World Heritage Sites, schedule monuments, Areas of Outstanding Natural Beauty (AONB) and National Parks, which are not dealt with in these comments.

The site is within 50m of the Thames Estuary & Marshes Ramsar Site and SPA and the submitted information has detailed that the nearby foreshore habitat is potentially suitable to support the species for which the Thames Estuary and Marshes Ramsar and SPA are designated. Grassland habitat adjacent to the site provides suitable habitat for notable overwintering bird species. Therefore the proposal may have an adverse impact on the SPA and Ramsar site.

To consider if the development will have significant effect on the environment, we have considered the selection criteria under 'Schedule 3' (EIA Regulations 2017). The site is within Canal and Grazing Marsh, Higham LWS and there is suitable habitat within adjacent to the site for breeding birds, reptiles, water voles, otter, GCN and foraging/commuting/roosting bats. Due to the fact that the site is within a LWS and the impact on species likely to be present we advise that a significant impact on the environment can not be ruled out.

Based on the above conclusions we advise that for this development an EIA for Ecology is required.

KCC Flood & Water Management

The LLFA understand that the proposed Tunnel Headhouse and SEC at the Gravesend site would have a gross impermeable area of 5000m². This will therefore have the potential to greatly increase surface water runoff compared to the existing greenfield scenario. Statement 3.9.15 within the report highlights that a drainage scheme will be developed to serve this area and a subsequent Drainage Strategy report compiled. The LLFA acknowledge this approach and should ensure that surface water runoff (post construction) is appropriately considered.

With the increase of impermeable areas and the nature of the site post construction, there is the concern around water quality to the receiving watercourses. It is noted in statement 3.9.32 that SuDS or proprietary treatment features will be incorporated into the future drainage scheme serving the site. The LLFA would request that the measures employed to treat water is clearly demonstrated within the future drainage strategy report.

KCC Heritage

The site lies within an area of multi-period archaeological potential adjacent to the Thames. The site is underlain by alluvial deposits which have the potential to contain, or overlie, nationally important, waterlogged archaeological remains from the late glacial to the post-medieval period. The site also includes the western end of the non-designated 19th century Milton Rifle Range. The range consists of a succession of low earthen mound firing points, a target mound and markers' gallery, as well as a weather shelter. The butts were modified in the 1890s and perhaps afterwards and part of the range is still in use today. The range saw continuous use and was used intensively for rifle practice during the First and Second World Wars and mortar firing practice was also carried out. Although the formation of the Metropolitan Police Training Facility has involved some further modifications to the southern end of the butts and to some of the firing points, there are substantial survivals of the original range structures.

The application for a Screening Opinion has been made with a Historic Environment Desk Based Assessment (Aecom, 2023) which usefully records the presently known heritage and archaeological data for the site and immediate surrounding area. The Historic Environment DBA recognises the important palaeoenvironmental potential, and the need for geoarchaeological field evaluation as a next step in understanding the archaeological potential of the site and to allow an appropriate assessment of the impact of the proposals. I am not in agreement, however, with statements in Section 7.2.2 of the DBA, that the site contains no non-designated heritage assets, nor that the Milton Rifle Range lies immediately east of the site boundary. In my opinion, the Milton Rifle Range should be considered as a non-designated heritage asset and the development site boundary lies within the western end of the original range, as is illustrated in the DBA figure 11.

The development has the potential to impact on significant, potentially nationally important, below-ground archaeological remains, as well, potentially having a significant negative impact on the non-designated Milton Rifle Range. The project should, in my opinion, be subject to EIA and the impact assessment process should include the use of purposive field evaluation data to investigate the below-ground archaeological potential and a detailed assessment of the full extent of the historic rifle range and the impact of the proposed development.

KCC Highways

A full Transport Assessment covering the impact on the nearby local highway network should be submitted in support of any application so that it may be assessed by the Local Highway Authority.

KCC Public Rights of Way

I can confirm that I do not have any objections to the above planning application at Eastcourt Marshes Electricity Substation. Public Right of Way Footpaths NG1 and NH2 lay to the north and south of the proposed site respectively. I enclose a copy of the Public Rights of Way network map showing the line of the paths for your information.

The granting of planning permission confers no other permission or consent on the applicant. It is therefore important to advise the applicant that no works can be undertaken on a Public Right of Way without the express consent of the Highways Authority. In cases of doubt the applicant should be advised to contact this office before commencing any works that may affect the Public Right of Way. Should any temporary closures be required to ensure public safety then this office will deal on the basis that:

- The applicant pays for the administration costs.
- The duration of the closure is kept to a minimum.
- Alternative routes will be provided for the duration of the closure.
- A minimum of six weeks notice is required to process any applications for temporary closures.

This means that the Public Right of Way must not be stopped up, diverted, obstructed (this includes any building materials or waste generated during any of the construction phases) or the surface disturbed. There must be no encroachment on the current width, at any time now or in future and no furniture or fixtures may be erected on or across Public Rights of Way without consent.

Environment Agency

We no longer respond to screening opinions and so have no comments to make.

Natural England

Natural England is a non-departmental public body. Our statutory purpose is to ensure that the natural environment is conserved, enhanced, and managed for the benefit of present and future generations, thereby contributing to sustainable development.

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.

Schedule 3(2) of the Town & Country Planning (Environmental Impact Assessment) Regulations 2017 requires consideration of the selection criteria for Schedule 2 EIA development and identification of

'environmental sensitivity'.

The proposed development is located within/partly within or has the potential for adverse effects on the following designated nature conservation sites or designated landscapes:

- South Thames Estuary & Marshes Site of Special Scientific Interest (SSSI)
- Mucking Flats & Marshes Site of Special Scientific Interest (SSSI)
- Halling to Trottscliffe Escarpment Site of Special Scientific Interest (SSSI)
- North Kent Marshes Functional Land
- North Downs Woodlands Special Area of Conservation (SAC),
- Thames Estuary & Marshes Special Protection Area (SPA)
- Thames Estuary & Marshes Ramsar Site

Methodology (provided within our overarching advice letter). Without this information Natural England will not be in a position to comment on the significance of the impacts. For large scale developments, Natural England may provide advice on a cost recovery basis through our **Discretionary advice service**.

All queries in relation to the application of this methodology to specific applications or development of strategic solutions will be treated as pre-application advice and therefore subject to chargeable services.

Natural England has not assessed the significance of any impacts on these designated sites or landscapes. The proposed development may therefore be likely to have significant effects on the interest features for which these sites are notified or the purposes of designation and we advise you to consider further whether an Environmental Impact Assessment (EIA) is required.

Should you decide that an EIA is not required, Natural England advises that sufficient information on the potential impacts of this proposal upon these designated sites/areas is submitted with any subsequent planning application. We would be pleased to discuss this further with the applicant through our **Discretionary Advice Service**.

Natural England does not hold information on the location of significant populations of protected species, so is unable to advise whether this proposal is likely to affect protected species to such an extent as to require an Environmental Impact Assessment (EIA). The developer must provide sufficient information for your authority to assess whether protected species are likely to be affected and, if so, whether appropriate avoidance, mitigation or compensation measures can be put in place. Further information is included in Natural England's **standing advice** on protected species.

Furthermore, Natural England does not routinely maintain locally specific data on all environmental assets. This development proposal may have environmental impacts on priority species and/or habitats, local wildlife sites, soils and best and most versatile agricultural land or on local landscape character that may be sufficient to warrant an EIA. Information on ancient woodland, ancient and veteran trees is set out in Natural England/Forestry Commission **standing advice**.

We therefore recommend that advice is sought from your ecological, landscape and soils advisers, local record centre, recording society or wildlife body on the local soils, best and most versatile agricultural land, landscape, geodiversity and biodiversity receptors that may be affected by the proposed development before determining whether an EIA is necessary.

Should you determine that an EIA is not required in this case, you should ensure that the application is supported by sufficient biodiversity, landscape and other environmental information in order for you to assess the weight to give these material considerations when determining the planning application. Should the proposal be amended in a way which significantly affects its impact on the natural environment then, in accordance with Section 4 of the Natural Environment and Rural Communities Act 2006, Natural England should be consulted again.

Port of London Authority

The proposed development relates to one new shaft headhouse and one new cable sealing end compound in Gravesham as one element of the TKRE Cable Tunnel Replacement Project. The project relates to a new bored tunnel under the River Thames constructed to house new cross linked polyethylene (XLPE) cables with associated new infrastructure proposed either side of the River Thames in Tilbury and Gravesend. On the tunnel itself table 2.1 (New Bored Cable Tunnel – Summary of Key Characteristics) states that the depth of the tunnel will be approximately 50m with a width of 4m. This will unlikely affect the river channel above it. However if for any reason the proposed depth cannot be achieved or maintained

then the PLA must be reconsulted to establish that the Tidal Thames remains unaffected.

The potential construction effects section (paragraph 3.8.16) states that there is the potential for construction to affect human and controlled waters receptors and for the ground conditions to impact on the design of the proposed development. Potential impacts listed include possible dewatering of the tunnel or the spoil during construction, and the discharge of water from dewatering to surface watercourses. To note if any new outfall to the tidal Thames is required as part of the works a River Works Licence (RWL) will be required with the PLA and the PLA's Statutory Consents and Compliance Team should be contacted at lic.app@pla.co.uk. Further information on this will be required in the forthcoming Drainage Strategy as part of any forthcoming planning application.

A key issue highlighted in the report is the requirement for the permanent disposal of the material/spoil removed from the tunnel during construction. Within the report it is highlighted that it is the applicant's preference that tunnel spoil will be removed by barge on the River Thames to reduce the number of HGVs on the wider road network, and that this will be reviewed further as part of the Environmental Appraisal Report (EAR). Paragraphs 2.3.12 and 3.9.29 of the report also state that some discussion has been held with the RSPB with regard to using excavated material in the formation of wetlands at RSPB Cliffe Pools to contribute to the creation of new habitat, or to support other habitat restoration and wetland projects in the Tilbury area. In principle this preference is supported. Paragraph 3.2.1 also states that it is the applicant's preference to remove the tunnel spoil from the construction site at Tilbury to and from existing jetty structures only. As part of the forthcoming planning application further detail will be required on this preference within the EAR, as well as the Transport Assessment and Construction Environmental Management Plan (CEMP) particularly with regard to maximising the use of the river as part of the construction stage, rather than by road. This should include details on any communication with operators/owners of existing river structures that may be utilised for the proposed development and any implications of barge movements on marine traffic. Furthermore it is noted in paragraph 3.7.12 that potential vessel emissions will also be considered in the forthcoming Air Quality Assessment, this is supported.

On other environmental matters, within the noise and vibration chapter it is noted that this does not specifically consider non-human sensitive receptors. Given the location in relation to various European designated sites it is considered that this must be addressed as part of the forthcoming planning application. It is noted that there are references elsewhere in the report on noise, for example paragraph 3.2.26 on underwater sound disturbance effects to marine mammals and fish, states that based on information available at this stage the applicant considers it unlikely that the proposed activities will generate sufficient underwater sound to exceed ambient levels - however, once full design details are available the impact pathway will be subject to further assessment to confirm that this. The PLA in principle support this approach.

Table 3.1 (Key Ecological Receptors) outlines the geographical scale of biodiversity for various receptors. Within this table the following amendments are required:

- Wintering and wading birds: As these are designated features of the Thames Estuary and Marshes Ramsar and Special Protection Area (SPA), it is considered that this would make them of international importance
- Breeding birds: As these are designated features of the associated Site of Special Scientific importance (SSSI), it is considered that this would make them of national importance

In addition to highlight that the most significant issue relating to birds is that of disturbance because of construction activities, including any potential effects of the noise and vibrations tunnelling activities on underwater feeding waterfowl and marine mammals. This must form a key consideration in the Habitats Regulations Assessment (HRA) as part of the forthcoming planning application. Furthermore to note that depending on the location, any mitigation/compensation identified in the HRA may have additional implications for the PLA.

Finally paragraphs 2.3.38 – 2.3.39 include some information on the decommissioning of existing assets, stating that decommissioning of the existing tunnel and associated infrastructure does not form part of this project. However the report also states that it is expected that the existing cables and cable joints within the existing tunnel will be purged of their oil and sent for recycling and that further tunnel inspection work will be required to assess this. To confirm the PLA consider that, if the existing tunnel is no longer going to be used, the existing tunnel and infrastructure should be removed from the river bed.

Historic England

Our primary remit would be the impact of the development upon the significance of designated assets either through physical impacts or through a development within their setting. This would be either highly graded listed buildings or scheduled monuments.

We confirm that the report is detailed, thorough and adequate for the purposes of this assessment, and we acknowledge there are limited numbers of designated heritage assets affected. We also confirm we broadly support the assessment, the list of the key receptors, cumulative impacts and summary of effects as set out in the Historic Environment section.

We are however mindful of the potential for non-designated heritage assets and archaeological matters within the red line boundary. Specifically, in this case it is the likelihood of archaeological and palaeo environmental remains associated with the Thames foreshore and the former marshlands.

We note this potential has been identified in the report but in our view these deposits should be ascribed a high-value because of the potential provide information on a range of indices, specifically things like climate change, the evolution of the Thames as well as human interaction with that landscape. Although this would not change the need for further assessment and the need for an appropriate approach to mitigation, we do consider the values and assessment of impacts are amended to reflect the significance of these deposits.

Overall, we agree that the historic environment represents a potentially significant issue in EIA terms. We note the applicant has confirmed the historic environment would be fully assessed which is appropriate and which we would support.

Please note however that the setting of heritage assets is not just restricted to visual impacts and other factors would also need to be considered. Noise, light, traffic and landscape assessments for example. Cultural heritage assessment would also need to be cross-referenced against other studies and impacts recorded accordingly

We strongly recommend that the applicant involve the county's specialist advisers on archaeological matters. We recognise that they are best placed to provide advice on non-designated heritage assets and to give advice on how the proposal can be tailored to avoid and minimise potential adverse impacts on the historic environment. They should also be asked to advise on mitigation and on any opportunities for securing wider benefits for the future conservation and management of heritage assets.

Likewise, the LPA's Conservation Officer will need to be consulted in relation to the Grade II listed buildings. Advice on these assets is broadly outside of the remit of Historic England.

Any assessment would also need to be carried out in accordance with established policy and guidance, including the National Policy Statements and National Planning Policy Framework, Planning Practice Guidance on heritage and we highly recommend as stated above use is made of the advice set out in GPA3 when considered the setting of heritage assets.

Whilst standardised EIA matrices are considered in some planning practices to be useful tools, we consider the analysis of setting (and the impact upon it) as a matter of qualitative and expert judgement which cannot be achieved solely by use of systematic matrices or scoring systems.

Historic England therefore recommends that these should be seen as material only to support a clearly expressed and non-technical narrative argument of harm and benefit, which is set out within the cultural heritage chapter. The ES should therefore address ideas of benefit, harm and loss (as described in NPPF) to set out 'what matters and why' in terms of the heritage assets' significance and setting, together with the effects of the development upon them.

We would also be looking for appropriate mitigation for any impacts and this could include actions that enhance the situation of any affected designate heritage assets or would provide an improved understanding of heritage matters.

Recommendation

We support the approach taken to compile this report and agree that the historic environment is an

important consideration. We recommend it is scoped into any further assessment in order to fully address the impact on the historic environment.

No response from:

- Marine Management Organisation

Publicity

Not required for a screening opinion application.

Analysis

The relevant regulations to consider the screening request against is the Town and Country Planning (Environmental Impact Assessment) Regulations 2017 (herein after referred to as the Regulations, 2017).

The Council needs to consider if the proposed development is either Schedule 1 or Schedule 2 development and if so whether the development of a new shaft headhouse and one new cable sealing end compound is likely to have a significant effect on the environment and therefore requires an assessment.

Schedule 1

The proposal does not fall within Schedule 1 of the Regulations (2017) that would require mandatory Environmental Impact Assessment (EIA).

Schedule 2

Schedule 2 development" as defined in the Regulations (2017) is

Development of a description mentioned in Column 1 of the table in Schedule 2 1 where:

- a. any part of that development is to be carried out in a sensitive area²; or
- b. any applicable threshold or criterion in the corresponding part of Column 2 of that table is respectively exceeded or met.

In this case, the proposed development subject of this screening request falls most closely within Schedule 2 by reason of Part 10(b)(i) in Column 1 for 'Urban development projects' and would exceed the threshold set in column 2 as it would consist of more than 1 hectare of development (at approximately 1.1 hectares (ha)) which is not dwellinghouse development. The proposal therefore now needs to be screened to determine whether significant effects on the environment are likely and whether an EIA is required.

Sensitive areas are defined in Regulation 2 of the 2011 Regulations as any of the following -

- (a) a site of special scientific interest (SSSI);
- (b) a National Park;
- (c) the Broads;
- (d) a property appearing on the World Heritage List;
- (e) a scheduled monument;
- (f) an area of outstanding natural beauty;
- (g) a European site within the meaning of regulation 8 of the Conservation of Habitats and Species Regulations 2010.

The site itself is not within a sensitive area but the screening report submitted with the application states the proximity of the following sensitive areas to the Gravesend site:

- 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. At its closest point it is approximately 50m from an existing pylon where restringing will occur. The headhouse and main works area is approximately 100m from the SPA/Ramsar;
- The foreshore areas adjoining the River Thames to the north of the Gravesend site are also considered to be suitable to support the species for which the Ramsar/SPA are designated;
- The Gravesend site is located within the Canal and Grazing Marsh, Higham Local Wildlife Site (LWS) a non-statutory designated site for nature conservation. The site is designated on the basis of remnant grazing marsh habitat which has been found to support a range of notable plant species;

- Other designated sites nearby include South Thames Estuary and Marshes SSSI, approximately 500m south, Mucking Flats and Marshes SSSI, approximately 2km north-east and Tilbury Marshes LWS approximately 2km north-west;
- The majority of the site consists of horse grazed semi-improved grassland with occasional scattered scrub and trees. In addition, a wet ditch directly adjoins the eastern and southern boundaries of the site. These habitats are potentially suitable to support notable plant species such as those listed on Section 41 of the Natural Environment and Rural Communities (NERC) Act (2006, as amended);
- The habitats at the Gravesend site have suitability to support several protected species. The grassland and scrub have suitability to support foraging bats, widespread species of reptile, notable bird species, badgers, hedgehogs, eels and notable invertebrates. The ditches are potentially suitable to support great crested newt, water vole and otter; and
- A single tree in close proximity to the proposed SEC was identified as having high suitability for roosting bats due to the multiple bark fissures, woodpecker holes and callous rolls in its trunk. There are invasive non-native plant species on site.

In addition Natural England advise the site is within/partly within or has the potential for adverse effects on the following designated nature conservation sites or designated landscapes:

- Halling to Trottiscliffe Escarpment Site of Special Scientific Interest (SSSI)
- North Kent Marshes Functional Land
- North Downs Woodlands Special Area of Conservation (SAC),

Schedule 3 Screening Criteria

Schedule 3 of the Regulations (2017) sets out the selection criteria for screening which are:

Characteristics of development

1. The characteristics of development must be considered 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).

Location of development

2.—(1) The environmental sensitivity of geographical areas likely to be affected by development must be considered, 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.

Types and characteristics of the potential impact

3. 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.

To ensure this is all carefully considered, where relevant, the Government provide an Environmental impact assessment screening checklist which they state can be used when screening for EIA although there is no obligation. This has been completed and can be found in Appendix 1 of this report.

Conclusion

Having assessed the available evidence it is the Local Planning Authority's opinion that the proposal is EIA development and that accordingly an Environmental Statement is required to accompany a planning application, please refer to the Screening Matrix in Appendix 1 for full details.

Given the nature of the development, the location and sensitivity of the area and the likely potential impact outlined in respect of biodiversity and ecology, geology and hydrology, noise and vibration, heritage and archaeology, landscape/townscape and visual effects, transport and access and cumulative impacts, it is considered that the proposal would be likely to have a significant impact on the environment. Gravesham Borough Council therefore concludes that the development is EIA development and that an EIA is therefore required.

Recommendation:

EIA Is Required.

See draft Decision

Case Officer:	Ms Rebecca Harrison	Team Leader:	Miss Faye Hobbs
Signed:	<i>Rebecca Harrison</i>	Signed:	
Dated:	3rd August 2023	Dated:	03 August 2023

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

1. CASE DETAILS			
Case Reference	20230668	Brief description of the project / development	One new shaft headhouse and one new cable sealing end compound.
Applicant	National Grid.		
LPA	Gravesham Borough Council		
2. EIA DETAILS			
Is the project Schedule 1 development according to Schedule 1 of the EIA Regulations?			N
If YES, which description of development (THEN GO TO Q4)			N/A
Is the project Schedule 2 development under the EIA Regulations?			Y
If YES, under which description of development in Column 1 and Column 2?			10(b) Urban development projects
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. At its closest point it is approximately 50m from an existing pylon where restringing will occur. The headhouse and main works area is approximately 100m from the Ramsar/SPA. The foreshore areas adjoining the River Thames to the north of the Gravesend site are also considered suitable to support the species for which the Ramsar/SPA are designated. The site is located within the Canal and Grazing Marsh, Higham Local Wildlife Site (LWS) and the Tilbury Marshes LWS is approximately 2km north-west. The South Thames Estuary and Marshes SSSI is approx. 50m south. The Mucking Flats and Marshes SSSI is approx. 2km north-east. The Halling to Trottscliffe Escarpment Site of Special Scientific Interest (SSSI) is also nearby as is the Kent Marshes Functional Land and the North Downs Woodlands Special Area of Conservation (SAC), The semi-natural grassland is a Habitats of Principal Importance supporting protected species. The foreshore contains sensitive intertidal habitats highlighted as sensitive in the Water Framework Directive (WFD). Habitats within the works area and adjacent area are suitable for notable invertebrates.

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

	Grassland habitat adjacent to the site provides suitable habitat for notable overwintering bird species. The scrub and grassland habitats have suitability for breeding birds and reptiles. Suitable habitat adjoining main works area for water voles. Ditches adjacent to the site have potential for otters. Possible potential for the ditches adjoining the site to have great crested newt although said to be unlikely. One tree with high suitability for roosting bats and suitable foraging habitat for foraging and commuting bats. The Thames and its banks are suitable for cetaceans and pinnipeds.
Are the applicable thresholds/criteria in Column 2 exceeded/met?	Yes
If yes, which applicable threshold/criteria?	(i) The development is more than 1 hectare of urban development which is not dwelling house development (Total area approx.. 1.1 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 part of the site in Gravesham consists of relatively flat ground across the area with a gentle sloping north to the Thames foreshore. The proposal for one new shaft headhouse and one new cable sealing end compound would not alter this.	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 proposal will use natural resources which are non-renewable.	No	The levels would be unlikely to be significant enough to cause a significant impact on the environment.
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, Thames & Medway Canal and unnamed watercourse.	Yes	As 10.1 – see below.

6. WASTE

6.1 Will the project produce solid wastes during construction or operation or decommissioning?	Yes	Excavation - Spoil from creation of the reception shaft on the Gravesend side (10,250 cubic metres).	No	The majority of the spoil from the project overall is to be excavated on the Tilbury side and National Grid are looking at how the spoil could be re-used to meet their
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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))
	Total spoil from the project would be 69,600 cubic metres (49,100 cubic metres for the tunnel and 10,250 cubic metres for each shaft at Gravesend & Tilbury). There would also be other construction waste.	commitment to zero waste to landfill target by 2026. Opportunities being considered include: • the infill and restoration of saline lagoon at RSPB Cliffe Pools providing benefits to aquatic invertebrates and located approximately 5.5km east of the Proposed Development on the south side of the River Thames (National Grid's preferred choice); • the infill of similar lagoons on neighbouring land owned by commercial operator, Brett Aggregates; • use as construction material for the various other large developments up and coming in the Tilbury area; and • to support other habitat restoration and wetland projects in the Tilbury area. Mitigation is to be considered for the whole of the proposed development and will aim to prioritise waste prevention, followed by preparing for reuse, recycling and recovery and lastly disposal to landfill as per the internationally recognised waste hierarchy. The following mitigation measures will be considered and implemented where applicable during the design phases and subsequent construction work: • Designing for reuse and recovery: identifying, securing, and using materials that already exist on site or can be sourced from other projects. • Designing for materials optimisation: simplifying layout and form to minimise material use, using standard design parameters, balancing cut and fill, maximising the use of renewable materials and materials with recycled content. • Designing for off-site construction: maximising the use of pre-fabricated structure and components, encouraging a process of assembly rather than construction. • Designing for the future (deconstruction and flexibility): identify how materials can be

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))
			designed to be more easily adapted over an asset lifetime and how deconstructability and demountability of elements can be maximised at end of first life. • Designing for waste and material efficient procurement: identify and specify materials that can be acquired responsibly, in accordance with a recognised industry standard. • The construction contractor would be required to implement a Construction Environmental Management Plan (CEMP) and a Site Waste Management Plan (SWMP) would be prepared as part of the CEMP. • The construction contractor would be required to implement a Materials Management Plan if one is required under the CL:AIRE Definition of Waste: Development Industry Code of Practice by the construction contractor to support the re-use of excavated materials, minimize off-site disposal; and to demonstrate the necessary lines of evidence to support the proper reuse/offsite disposal of materials and ensure compliance with regulatory guidance. • Incorporation of "appropriate facilities for the storage and recycling of waste" as required by Gravesend Council Policy CS19. • Application of National Grid's materials and waste targets. Taking into account the amount of waste proposed for the Gravesend site and the proposed mitigation it is considered the impact on the environment in respect of waste would not be significant.
7. POLLUTION AND NUISANCES			
7.1 Will the project release pollutants or any hazardous, toxic or noxious substances to air?	Yes	The report states that the proposed development has the potential to impact on local air quality through construction phase dust emissions, construction phase traffic emissions and construction phase energy plant	No The report states the proposed mitigation measures to be incorporated into design and construction will reduce effects such that they are unlikely to be significant. GBC Environmental

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))
	Emissions and these impacts have the potential to impact on amenity, human health and nature conservation receptors close to the site and human health sensitive receptors adjacent to the road network on the construction traffic route. Also that in the absence of the mitigation, there is potential for increased emissions from construction to result in likely significant effects on local air quality.	Protection advise that the construction phase impacts relating to dust can be addressed by a suitably detailed Construction Environmental Management Plan (CEMP) which can be submitted with the full planning application. Subject to this it is considered the impact on the environment in respect of air pollutants would not be significant.
7.2 Will the project cause noise and vibration or release of light, heat, energy or electromagnetic radiation?	Yes The report states that without mitigation there would be significant noise and vibration effects during the construction or operational phases. GBC Environmental Protection advise that there will be an impact from noise and vibration during the construction and operational phases unless there is appropriate mitigation – sensitive receptors are to the west of the site (daytime only) with residential being located much further away to the south so they state would not be impacted as such.	Yes The report states that appropriate mitigation measures such as the 'best practicable means' as defined in Section 72 of the Control of Pollution Act and the use of attenuators and acoustic louvers will be incorporated into the design and construction such that residual effects are unlikely to be significant. It is proposed that more detail on potential effects and mitigation requirements will be set out in an Environmental Report which accompanies the relevant consent application. GBC Environmental Protection acknowledge that further detail on impact will be given in the Environmental Report along with mitigation and they advise that with appropriate mitigation any potential impact would be minimised and would not be significant. However, it is considered that the impact on the environment would likely to be significant in respect of noise and vibration given that the ditches system forms an integral part of the biodiversity and ecology of the area and any noise and vibration from the development could significantly impact on this.
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 The report identifies the following: • mobilising existing contamination in soil and groundwater as a result of ground disturbance (due to the installation of foundations/ structures) and dewatering (if needed) during construction;	Yes Assessment of land contamination will take the form of a tiered, risk-based approach: • Tier 1: preliminary risk assessment based on a desktop study of available information to identify

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))
	• increasing the potential for contaminants in unsaturated soils to leach to groundwater in open excavations during construction; • increasing the potential for contaminated surface run-off to migrate to surface water and groundwater receptors as a result of leaching from uncovered stockpiles; • discharge of water from dewatering to surface watercourses; • introducing new sources of contamination, such as fuels and oils used in construction plant; • creating preferential pathways for the migration of contamination and gases, for example along new below ground service routes, service ducts and as a result of dewatering; and • introducing new human health receptors such as site staff during construction.	potential sources of contamination, receptors to contamination and potential pathways between them. The identified sources, pathways and receptors are presented in the form of an initial Conceptual Site Model (CSM) showing the potential contaminant linkages (PCL); • Tier 2: If PCL are identified, this means there is a theoretical risk to receptors from contamination. Therefore, intrusive investigation should be used to provide data to inform a generic quantitative risk assessment (GQRA). The GQRA involves comparison of site-specific, laboratory analytical data against appropriate generic assessment criteria (GAC) for human health and/or controlled waters which represent minimal or tolerable risk; and • Tier 3: detailed quantitative risk assessment to identify whether contamination identified above minimal or tolerable risk levels represents an unacceptable risk and therefore requires remediation. A number of environmental design and management measures will be employed as standard best practice to minimise impacts to human health, controlled waters and soil resources during the construction of the proposed development. These will be incorporated into the Outline Construction Environmental Management Plan (CEMP) to be prepared alongside the Environmental Appraisal Report. Potential environmental impacts that will be avoided, prevented, reduced or offset through the implementation of these mitigation measures include: • human exposure through direct contact/inhalation/dermal uptake of contaminants; • creation of preferential pathways and mobilisation of contamination; • contamination of natural soils, contamination of groundwater with concrete, paste or grout;

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))
		• pollution and degradation of water quality of any underlying aquifer; • infiltration and/or runoff into the local drainage/sewerage network - pollution of drainage and sewerage network and any adjacent surface water features; • run-off and infiltration of contaminants from material stockpiles; • contamination of drainage and sewerage network and/or groundwater; and • spread of nuisance dusts and soils to the wider environment and local roads. A ground investigation is currently on-going at the site, to characterise existing ground conditions which will allow a quantitative assessment as to whether any of the potential risks identified are present and are of material concern to the proposed development. It is stated in the report that subject to the findings of intrusive investigations, a site-specific Remediation Strategy (and subsequent verification reporting) may be required if contamination is encountered or considered to pose an unacceptable risk. A Phase 1 Preliminary Risk Assessment (PRA) report, to be completed and submitted to the Local Planning Authorities. Although the existing Geotechnical and Geoenvironmental Desk Study provides an indication that potential ground contamination may be present at the Site, it does not include a risk assessment. The primary objective of a Phase 1 PRA report is to identify potential land quality liabilities and contamination risks at the sites. Potential liabilities and risks in this context may derive from: • Contamination due to past and current uses of the site and surrounding land, in the context of the environmental sensitivity of the site setting; • Changes in land use; and • Potential natural ground hazards and constraints associated with the local ground conditions.

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))
			GBC Environmental Protection state this staged approach is acceptable and in line with their usual requirements. It is stated in the report that it is anticipated that the results and recommendations of the Phase 1 Preliminary Risk Assessment (PRA) once incorporated into the Draft Construction Environmental Management Plan (CEMP) along with the environmental design and management measures for the construction, operation and decommissioning phases, will negate the need for a statutory geology and hydrogeology assessment. However, this view is questioned. The ditches system forms an integral part of the biodiversity and ecology which is present there. There is concern there could be impact given the intricate ecological and hydrological systems at the site. The impact on the environment is therefore considered to have the potential to be significant in respect of geology and hydrology.
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	There is the potential for contaminative uses to have been present in the area of the Gravesend site.	No The Phase 1 Preliminary Risk Assessment (PRA) & Construction Environmental Management Plan (CEMP) as discussed in 7.3 above would address this.
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?	No	No risks identified.	

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))
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	As discussed in 7.1 & 7.3 above the proposal has the potential to impact on air quality and pollution of waters.	Yes Particularly in relation to water contamination - see 7.3 above.
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	The site is adjoined to the east and south by an unnamed water course. The River Thames is approx. 140m north of the site and the Thames & Medway Canal is approx. 85m south of the site.	No KCC Flood & Water Management state that the impermeable area of the headhouse and Sealing End Compound (SEC) at 5,000 sq. m will have the potential to greatly increase surface water run-off compared to the existing greenfield scenario. They advise that the proposed Drainage Strategy report should ensure that surface water run-off is appropriately considered and that this report should also demonstrate what measures will be used to treat water to ensure no impact on water quality. Subject to this and any necessary mitigation it is considered there would be no significant impact on the environment in respect of flood risk.
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	Site is within or close to: - 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. At its closest point it is approximately 50m from an existing pylon where restringing will occur. The headhouse and main works area is approximately 100m from the SPA/Ramsar; - The foreshore areas adjoining the River Thames to the north of the Gravesend site are also considered to be suitable to support the species for which the Ramsar/SPA are designated;	Yes Natural England advise that based on the information submitted there are potential likely significant effects on statutorily designated nature conservation sites or landscapes and further assessment is required. KCC Biodiversity advise that there are likely to be significant impacts and therefore an EIA for ecology is required. They advise that due to the proximity to the Thames Estuary & Marshes Ramsar Site and SPA and the nearby foreshore as well as the grassland habitat adjacent to the site providing suitable habitat for notable overwintering birds, the proposal may have an impact on the SPA and Ramsar site. They also advise that due to the site being within the Canal and Grazing Marsh, Higham Local Wildlife Site (LWS) and there being suitable habitat for breeding birds, reptiles, water

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))
(international, national, regional or local))).		• The Gravesend site is located within the Canal and Grazing Marsh, Higham Local Wildlife Site (LWS); • South Thames Estuary & Marshes Site of Special Scientific Interest (SSSI); • Mucking Flats & Marshes Site of Special Scientific Interest (SSSI); • Halling to Trottiscliffe Escarpment Site of Special Scientific Interest (SSSI); • North Kent Marshes Functional Land • North Downs Woodlands Special Area of Conservation (SAC); • Habitats for a number of protected and non-protected species.	voles, otter, great crested newt and foraging/commuting/roosting bats, there is likely to be an impact on species likely to be present and they cannot rule out that the impact on the environment would not be significant. The impact on the environment is therefore considered to have the potential to be significant in respect of biodiversity and ecology.
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	See 10.1 above.	Yes See 10.1 above.
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).	Yes	The Gravesend site is not subject to any locally, nationally or internationally important landscape designations. However, given the scale of the development and that the site is highly visible it is considered there could be an impact in landscape and visual terms.	Yes The design of the new pylon in Gravesend is not known and as an existing pylon on the Gravesend site is to be left in place, it is considered this would cause visual harm and the impact on the environment in terms of townscape, landscape and visual harm would likely to be significant.

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

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))
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	It is situated in close proximity to the River Thames (approx. 150m to the north) and so would be visible from not only surrounding area in Gravesend but also visible from Tilbury opposite.	Yes As stated above in 11.1 due not knowing the design of the new pylon and that an existing pylon is to remain it is considered the impact on the environment in respect of townscape, landscape and visual harm would likely to be significant.
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).	Yes	The site lies within an area of multi-period archaeological potential adjacent to the Thames. There are designated and non-designated heritage assets within the surrounding area.	Yes An Historic Environment Desk Based Assessment has been submitted with the application. KCC Heritage advise that the development has the potential to impact on significant, potentially nationally important, below-ground archaeological remains, as well, potentially having a significant negative impact on the non-designated Milton Rifle Range and that the project should be subject to EIA. Historic England acknowledge there would be limited designated heritage assets affected. The are however, mindful of the potential for non-designated heritage assets and archaeological matters within the red line boundary. Specifically, in this case it is the likelihood of archaeological and palaeo environmental remains associated with the Thames foreshore and the former marshlands. They note this potential has been identified in the report but they consider that these deposits should be ascribed a high-value because of the potential to provide information on a range of indices, specifically things like climate change, the evolution of the Thames as well as human interaction with that landscape. They note that although this would not change the need for further assessment and the need for an appropriate approach to mitigation, they do consider the values and assessment of impacts are amended to reflect the significance of these deposits.

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))
			Overall, they consider that the historic environment represents a potentially significant issue in EIA terms. It is therefore considered that the impact on the environment has the potential to be significant in respect of heritage and archaeology.
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?	Yes	Due to the construction of the southern shaft and the necessary buildings and pylons to receive the cables and connect to the overhead wire system in Gravesend. Plus, the removal of the Tunnel Boring Machine.	Yes For the Gravesend site there are expected to be up to 21 HGV vehicle movements a day, with an average of 10 per day. This type of traffic would mainly be associated with the delivery of materials and equipment as follows: • Tunnel shaft construction; • Tunnel shaft lining segments delivery; • AILs for the TBM; • Shaft fit out and head house construction; • Sealing end compound construction; and • 400kv overhead line diversions. It is anticipated that all HGV traffic would access the site from Wharf Road. The proposed construction route is the shortest available between the site and the SRN: • Arrivals: M2/A2 – A289 – A226 – Ordnance Road – Canal Road – Norfolk Road – Mark Lane – Wharf Road; and • Departures: Wharf Road – Mark Lane – Norfolk Road – Canal Road – Ordnance Road – A226 – A289 – M2/A2. A limited number of light vehicle movements are

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))
		envisaged during the construction phase as a result of construction staff. A Construction Logistic Plan (CLP) would be prepared to ensure that all traffic associated with the construction works operate in a safe and compliant manner at all times. The specific mitigation measures in the CLP would be agreed with Gravesham Borough Council and/ or Kent County Council (through regular liaison) and adhered to by the appointed Contractor. The CLP is expected to include the following: • Measures designed to manage construction traffic (e.g. HGVs and construction staff at the start and end of the working day) in order to minimise the impact on local residents, businesses, road users and other potentially sensitive land uses and ensure all third-party traffic interfacing with the proposed development is kept safe from the on-going work; • A traffic routing strategy to ensure vehicles accessing the site do so via the most appropriate route(s) and to avoid (or minimise) conflict with sensitive areas such as residential areas; • Access security personnel and traffic marshals to ensure the access point is managed safely and securely. Swept path analysis will be undertaken to ensure vehicles can safely enter and exit the Proposed Development from/ to the local highway network without impacting road users; • Temporary traffic management/ construction signage at the site access point and on the approach to the site access (as required) to ensure safe movements of all road users; • A parking review to ensure a clear route is available to construction vehicles travelling to/ from the Proposed Development, particularly on local/ access roads;

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))	
				• A requirement for vehicles to be correctly maintained and operated in accordance with the manufacturer's recommendations and in a responsible manner; • A Driver Information Pack covering a variety of topics and providing information on the requirements of working on the Proposed Development; • A specialised haulage service to allow AILs to be transported, with the necessary escort, permits and traffic management in place; and • An access route inspection and swept path analysis for the largest equipment/ construction material delivery vehicles and transporters (including AILs) would also be undertaken to determine the need for any additional control measures. GBC Highways advise that the level of traffic would not be considered significant but could involve some abnormal loads which will require careful management. However, it is considered that due to the number of trips proposed which involve HGV's together with how the site will be accessed will impact on biodiversity and ecology as well as other impacts such as noise and disturbance. The impact on the environment is therefore considered to have the potential to be significant in respect of transport and access.
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	
14. LAND USE				
14.1 Are there existing land uses or community facilities on or around the	Yes	To the north of the site is the Saxon Shore Way with more vegetation beyond and the River Thames	Yes	Due to the distance of the nearest sensitive receptors and in respect of certain areas – biodiversity and

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))	
location which could be affected by the project? E.g. housing, densely populated areas, industry / commerce, farm/agricultural holdings, forestry, tourism, mining, quarrying, facilities relating to health, education, places of worship, leisure /sports / recreation.		beyond that. To the east is the Milton Rifle Range, to the west is the Thameside Campus (National Maritime Training Centre), Metropolitan Police Specialist Training Centre (MPSTC) and Thames and the Medway Canal Association and to the south is the railway and Thames and Medway Canal. There is housing to the south.		ecology, geology and hydrology, noise and vibration, townscape/landscape (visual effects) and transport and access it is considered the impact on other land uses or community facilities could be significant.
14.2 Are there any plans for future land uses on or around the location which could be affected by the project?	No		N/A	
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?	No		N/A	
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?	Yes	Lower Thames Crossing is at the pre-examination phase.	Yes	The effects from a number of matters in this checklist including highways, biodiversity and pollution, amongst others, could have a cumulative impact when other developments such as Lower Thames Crossing are taken into consideration. It considered further information would be needed in this regard.
17. TRANSBOUNDARY EFFECTS				
17.1 Is the project likely to lead to transboundary effects? ²	Yes	The site is located in close proximity to Essex.	No	A separate EIA screening opinion has been submitted to Thurrock Council which has been determined by way of EIA is not required.

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

The proposed development has been assessed against the criteria in Schedules 2 and 3 to the Town and Country Planning (Environmental Impact Assessment) Regulations 2017 (as amended). It is considered that an Environmental Statement is required as the proposed development is likely to result in significant impacts on the environment.

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	Rebecca Harrison
DATE	03/08/2023



Historic England

EAST OF ENGLAND OFFICE

Rebecca Harrison
Senior Planning Officer
Gravesham Borough Council

E-mail: [REDACTED]

BY EMAIL

Our ref: PL00793582

Your ref: Scoping

Telephone 01223 582710

31st July 2023

**Request for Scoping Opinion regarding Environmental Impact Assessment.
Town and Country Planning (Environmental Impact Assessment) (England and
Wales) Regulations 1999, for the TKRE Cable Tunnel Replacement Project
Tillbury (Essex) to Grain (Kent)**

Dear Rebecca

Thank you for your e-mail dated 19th July 2023 with a formal request for a scoping opinion in accordance with Regulation 13 of the Town and Country Planning (Environmental Impact Assessment) Regulations 2011.

Historic England, as the governments lead advisors on the historic environment would like to offer our comments on this proposal, taking into consideration the information provided by the applicant.

This is the TKRE Cable Tunnel Replacement Project Environmental Screening Report (June 2022)

Historic England Advice

Our primary remit would be the impact of the development upon the significance of designated assets either through physical impacts or through a development within their setting. This would be either highly graded listed buildings or scheduled monuments.

We confirm that the report is detailed, thorough and adequate for the purposes of this assessment, and we acknowledge there are limited numbers of designated heritage assets affected. We also confirm we broadly support the assessment, the list of the key receptors, cumulative impacts and summary of effects as set out in the Historic Environment section.



24 BROOKLANDS AVENUE, CAMBRIDGE, CB2 8BU

Telephone 01223 582749
HistoricEngland.org.uk





We are however mindful of the potential for non-designated heritage assets and archaeological matters within the red line boundary. Specifically, in this case it is the likelihood of archaeological and palaeo environmental remains associated with the Thames foreshore and the former marshlands.

We note this potential has been identified in the report but in our view these deposits should be ascribed a high-value because of the potential provide information on a range of indices, specifically things like climate change, the evolution of the Thames as well as human interaction with that landscape. Although this would not change the need for further assessment and the need for an appropriate approach to mitigation, we do consider the values and assessment of impacts are amended to reflect the significance of these deposits.

Overall, we agree that the historic environment represents a potentially significant issue in EIA terms. We note the applicant has confirmed the historic environment would be fully assessed which is appropriate and which we would support.

Please note however that the setting of heritage assets is not just restricted to visual impacts and other factors would also need to be considered. Noise, light, traffic and landscape assessments for example. Cultural heritage assessment would also need to be cross-referenced against other studies and impacts recorded accordingly

We strongly recommend that the applicant involve the county's specialist advisers on archaeological matters. We recognise that they are best placed to provide advice on non-designated heritage assets and to give advice on how the proposal can be tailored to avoid and minimise potential adverse impacts on the historic environment. They should also be asked to advise on mitigation and on any opportunities for securing wider benefits for the future conservation and management of heritage assets.

Likewise, the LPA's Conservation Officer will need to be consulted in relation to the Grade II listed buildings. Advice on these assets is broadly outside of the remit of Historic England.

Any assessment would also need to be carried out in accordance with established policy and guidance, including the National Policy Statements and National Planning Policy Framework, Planning Practice Guidance on heritage and we highly recommend as stated above use is made of the advice set out in GPA3 when considered the setting of heritage assets.



Whilst standardised EIA matrices are considered in some planning practices to be useful tools, we consider the analysis of setting (and the impact upon it) as a matter of qualitative and expert judgement which cannot be achieved solely by use of systematic matrices or scoring systems.

Historic England therefore recommends that these should be seen as material only to support a clearly expressed and non-technical narrative argument of harm and benefit, which is set out within the cultural heritage chapter. The ES should therefore address ideas of benefit, harm and loss (as described in NPPF) to set out 'what matters and why' in terms of the heritage assets' significance and setting, together with the effects of the development upon them.

We would also be looking for appropriate mitigation for any impacts and this could include actions that enhance the situation of any affected designate heritage assets or would provide an improved understanding of heritage matters.

Recommendation

We support the approach taken to compile this report and agree that the historic environment is an important consideration. We recommend it is scoped into any further assessment in order to fully address the impact on the historic environment.

If you have any queries about any of the above, or would like to discuss anything further, please contact me

Yours sincerely,

Will Fletcher

Will Fletcher
Development Advice Team Leader
will.fletcher@HistoricEngland.org.uk



ECOLOGICAL ADVICE SERVICE

TO: *Rebecca Harrison*

FROM: *Helen Forster*

DATE: *14 July 2023*

SUBJECT: *20230668 Eastcourt Marshes Electricity Substation, Gravesend*

The following is provided by Kent County Council's Ecological Advice Service (EAS) for Local Planning Authorities. It is independent, professional advice and is not a comment/position on the application from the county council. It is intended to advise the relevant planning officer(s) on the potential ecological impacts of the planning application and if sufficient/appropriate ecological information has been provided.

Any additional information, queries or comments on this advice that the applicant or other interested parties may have must be directed in every instance to the planning officer, who will seek input from the EAS where appropriate and necessary.

EIA SCREENING

We have reviewed the submitted information in regard to determining if an environmental impact assessment (EIA) will need to be carried out and advise there are likely to be significant impacts. Therefore, an EIA for ecology is required.

Schedule 1

Under the Town and Country Planning (EIA) Regulations 2017, developments falling within Schedule 1 always require an EIA and are referred to as 'Schedule 1' developments.

EIA Screening

If the development falls within the selection criteria for a 'schedule 2' development of the Town and Country Planning (Environmental Impact Assessment) Regulations 2017, then it needs to be determined whether the proposal is situated within a 'sensitive area' and/or whether it is likely to have significant effects on the environment. Sensitive areas (as identified under Section 2(1), include the following ecologically designated sites: Site of Special Scientific Interest (SSSI), European Sites (Special Protection Areas (SPA), Special Areas of Conservation (SAC) and Ramsar Sites)). If the proposed development is located in, partly in, or has the potential to have any negative effect on these sites, then an assessment will be required. The regulations also include World Heritage Sites, schedule

monuments, Areas of Outstanding Natural Beauty (AONB) and National Parks, which are not dealt with in these comments.

The site is within 50m of the Thames Estuary & Marshes Ramsar Site and SPA and the submitted information has detailed that the nearby foreshore habitat is potentially suitable to support the species for which the Thames Estuary and Marshes Ramsar and SPA are designated. Grassland habitat adjacent to the site provides suitable habitat for notable overwintering bird species. Therefore the proposal may have an adverse impact on the SPA and Ramsar site.

To consider if the development will have significant effect on the environment, we have considered the selection criteria under 'Schedule 3' (EIA Regulations 2017). The site is within Canal and Grazing Marsh, Higham LWS and there is suitable habitat within adjacent to the site for breeding birds, reptiles, water voles, otter, GCN and foraging/commuting/roosting bats. Due to the fact that the site is within a LWS and the impact on species likely to be present we advise that a significant impact on the environment can not be ruled out.

Based on the above conclusions we advise that for this development an EIA for Ecology is required.

If you have any queries regarding our comments, please do not hesitate to get in touch.

Helen Forster MCIEEM
Biodiversity Officer

This response was submitted following consideration of the following documents:
Screening report.



Rebecca Harrison
Gravesham Borough Council
Civic Centre
Windmill Street
Gravesend
Kent
DA12 1AU

Flood and Water Management
Invicta House
Maidstone
Kent
ME14 1XX

Website: www.kent.gov.uk/flooding
Email: suds@kent.gov.uk
Tel: 03000 41 41 41
Our Ref: GBC/2023/096071
Date: 13 July 2023

Application No: 20230668

Location: Eastcourt Marshes Electricity Substation, Mark Lane, Gravesend, Kent
DA12 2HR

Proposal: Request for a screening opinion in accordance with The Town and Country Planning Act (Environmental Impact Assessment) Regulations 2017 in respect of the one new shaft headhouse and one new cable sealing end compound

Thank you for your consultation on the above referenced planning application. Kent County Council as Lead Local Flood Authority have reviewed the Environmental Screening Report (June 2023) and have the following comment to provide:

The LLFA understand that the proposed Tunnel Headhouse and SEC at the Gravesend site would have a gross impermeable area of 5000m². This will therefore have the potential to greatly increase surface water runoff compared to the existing greenfield scenario. Statement 3.9.15 within the report highlights that a drainage scheme will be developed to serve this area and a subsequent Drainage Strategy report compiled. The LLFA acknowledge this approach and should ensure that surface water runoff (post construction) is appropriately considered.

With the increase of impermeable areas and the nature of the site post construction, there is the concern around water quality to the receiving watercourses. It is noted in statement 3.9.32 that SuDS or proprietary treatment features will be incorporated into the future drainage scheme serving the site. The LLFA would request that the measures employed to treat water is clearly demonstrated within the future drainage strategy report.

This response has been provided using the best knowledge and information submitted as part of the planning application at the time of responding and is reliant on the accuracy of that information.

Yours faithfully,

Daniel Hoare
Senior Flood Risk Officer
Flood and Water Management



Heritage Conservation

Rebecca Harrison
Planning Officer
Growth, Environment and Transport
Kent County Council
Invicta House
Maidstone
ME14 1XX

Heritage Conservation
Kent County Council
Invicta House
Maidstone
ME14 1XX

Ask for: Casper Johnson
Email: [REDACTED]

21 July 2023

2023 0668 – Eastcourt Marshes Electricity Substation, Mark Lane, Gravesend, Kent DA12 2HR

Request for a screening opinion in accordance with The Town and Country Planning Act (Environmental Impact Assessment) Regulations 2017 in respect of the one new shaft headhouse and one new cable sealing end compound

Thank you for consulting us for a screening opinion on the proposed development at East Court Marshes.

The site lies within an area of multi-period archaeological potential adjacent to the Thames. The site is underlain by alluvial deposits which have the potential to contain, or overlie, nationally important, waterlogged archaeological remains from the late glacial to the post-medieval period. The site also includes the western end of the non-designated 19th century Milton Rifle Range. The range consists of a succession of low earthen mound firing points, a target mound and markers' gallery, as well as a weather shelter. The butts were modified in the 1890s and perhaps afterwards and part of the range is still in use today. The range saw continuous use and was used intensively for rifle practice during the First and Second World Wars and mortar firing practice was also carried out. Although the formation of the Metropolitan Police Training Facility has involved some further modifications to the southern end of the butts and to some of the firing points, there are substantial survivals of the original range structures.

The application for a Screening Opinion has been made with an Historic Environment Desk Based Assessment (Aecom, 2023) which usefully records the presently known heritage and archaeological data for the site and immediate surrounding area. The Historic Environment DBA recognises the important palaeoenvironmental potential, and the need for geoarchaeological field evaluation as a next step in understanding the archaeological potential of the site and to allow an appropriate assessment of the impact of the proposals. I am not in agreement, however, with statements in Section 7.2.2 of the DBA, that the site contains no non-designated heritage assets, nor that the Milton Rifle Range lies immediately east of the site boundary. In my opinion, the Milton Rifle Range should be considered as a non-designated heritage asset and the development site boundary lies within the western end of the original range, as is illustrated in the DBA figure 11.

The development has the potential to impact on significant, potentially nationally important, below-ground archaeological remains, as well, potentially having a significant negative impact on the non-designated Milton Rifle Range. The project should, in my opinion, be subject to EIA and the impact assessment process should include the use of purposive field evaluation data to investigate the below-ground archaeological potential and a detailed assessment of the full extent of the historic rifle range and the impact of the proposed development.

I would be happy to discuss the scope of field evaluation, and any other aspects of my comments above, with the applicant.

Yours sincerely

Casper Johnson FSA

Senior Archaeological Officer
Heritage Conservation Team
Environment, Planning & Enforcement



Gravesham Borough Council
Civic Centre
Windmill Street
Gravesend
Kent
DA12 1AU

Highways and Transportation

Kroner House

Eurogate Business Park
Ashford

TN24 8XU

Tel: 03000 418181

Date: 19 July 2023

Our Ref:

Application - GB/20230668

**Location - Eastcourt Marshes Electricity Substation, Mark Lane,
Gravesend, Kent DA12 2HR**

**Proposal - Request for a screening opinion in accordance with The
Town and Country Planning Act (Environmental Impact
Assessment) Regulations 2017 in respect of the one new
shaft headhouse and one new cable sealing end compound**

Thank you for your consultation in relation to the above planning application. I have the following comments to make with respect to highway matters :-

A full Transport Assessment covering the impact on the nearby local highway network should be submitted in support of any application so that it may be assessed by the Local Highway Authority.

Informative: It is important to note that planning permission does not convey any approval to carry out works on or affecting the public highway.

Any changes to or affecting the public highway in Kent require the formal agreement of the Highway Authority, Kent County Council (KCC), and it should not be assumed that this will be given because planning permission has been granted. For this reason, anyone considering works which may affect the public highway, including any highway-owned street furniture, is advised to engage with KCC Highways and Transportation at an early stage in the design process.

Across the county there are pieces of land next to private homes and gardens that do not look like roads or pavements but are actually part of the public highway. Some of this highway land is owned by Kent County Council whilst some is owned by third party owners. Irrespective of the ownership, this land may have highway rights over the topsoil.

Works on private land may also affect the public highway. These include works to cellars, to retaining walls which support the highway or land above the highway, and to balconies, signs or other structures which project over the highway. Such works also require the approval of the Highway Authority.

Kent County Council has now introduced a formal technical approval process for new or altered highway assets, with the aim of improving future maintainability. This process applies to all development works affecting the public highway other than applications for vehicle crossings, which are covered by a separate approval process.

Should the development be approved by the Planning Authority, it is the responsibility of the applicant to ensure, before the development is commenced, that all necessary highway approvals and consents have been obtained and that the limits of the highway boundary have been clearly established, since failure to do so may result in enforcement action being taken by the Highway Authority. The applicant must also ensure that the details shown on the approved plans agree in every aspect with those approved under the relevant legislation and common law. It is therefore important for the applicant to contact KCC Highways and Transportation to progress this aspect of the works prior to commencement on site.

Guidance for applicants, including information about how to clarify the highway boundary and links to application forms for vehicular crossings and other highway matters, may be found on Kent County Council's website:

<https://www.kent.gov.uk/roads-and-travel/highway-permits-and-licences/highways-permissions-and-technical-guidance>. Alternatively, KCC Highways and Transportation may be contacted by telephone: 03000 418181

Yours Faithfully

Director of Highways & Transportation

*This is a statutory technical response on behalf of KCC as Highway Authority. If you wish to make representations in relation to highways matters associated with the planning application under consideration, please make these directly to the Planning Authority.

Date: 06 July 2023
Our ref: 440206
Your ref: 20230668



Ms R Harrison
Gravesham Borough Council
Civic Centre
Windmill Street
Gravesend DA12 1AU

Hornbeam House
Crewe Business Park
Electra Way
Crewe
Cheshire
CW1 6GJ

T 0300 060 3900

BY EMAIL ONLY

planning.reps@gravesham.gov.uk

Dear Ms Harrison,

Environmental Impact Assessment Screening consultation: Request for a screening opinion in accordance with The Town and Country Planning Act (Environmental Impact Assessment) Regulations 2017 in respect of the one new shaft headhouse and one new cable sealing end compound

Location: Eastcourt Marshes Electricity Substation, Mark Lane, Gravesend, Kent DA12 2HR

Thank you for your consultation on the above dated 29 June 2023 which was received by Natural England on the same date.

Natural England is a non-departmental public body. Our statutory purpose is to ensure that the natural environment is conserved, enhanced, and managed for the benefit of present and future generations, thereby contributing to sustainable development.

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.

Schedule 3(2) of the Town & Country Planning (Environmental Impact Assessment) Regulations 2017 requires consideration of the selection criteria for Schedule 2 EIA development and identification of 'environmental sensitivity'.

The proposed development is located within/partly within or has the potential for adverse effects on the following designated nature conservation sites or designated landscapes:

- South Thames Estuary & Marshes Site of Special Scientific Interest (SSSI)
- Mucking Flats & Marshes Site of Special Scientific Interest (SSSI)
- Halling to Trottiscliffe Escarpment Site of Special Scientific Interest (SSSI)
- North Kent Marshes Functional Land
- North Downs Woodlands Special Area of Conservation (SAC),

- Thames Estuary & Marshes Special Protection Area (SPA)
- Thames Estuary & Marshes Ramsar Site

Methodology (provided within our overarching advice letter). Without this information Natural England will not be in a position to comment on the significance of the impacts. For large scale developments, Natural England may provide advice on a cost recovery basis through our [Discretionary advice service](#).

All queries in relation to the application of this methodology to specific applications or development of strategic solutions will be treated as pre-application advice and therefore subject to chargeable services.

Natural England has not assessed the significance of any impacts on these designated sites or landscapes. The proposed development may therefore be likely to have significant effects on the interest features for which these sites are notified or the purposes of designation and we advise you to consider further whether an Environmental Impact Assessment (EIA) is required.

Should you decide that an EIA is not required, Natural England advises that sufficient information on the potential impacts of this proposal upon these designated sites/areas is submitted with any subsequent planning application. We would be pleased to discuss this further with the applicant through our [Discretionary Advice Service](#).

Natural England does not hold information on the location of significant populations of protected species, so is unable to advise whether this proposal is likely to affect protected species to such an extent as to require an Environmental Impact Assessment (EIA). The developer must provide sufficient information for your authority to assess whether protected species are likely to be affected and, if so, whether appropriate avoidance, mitigation or compensation measures can be put in place. Further information is included in Natural England's [standing advice](#) on protected species.

Furthermore, Natural England does not routinely maintain locally specific data on all environmental assets. This development proposal may have environmental impacts on priority species and/or habitats, local wildlife sites, soils and best and most versatile agricultural land or on local landscape character that may be sufficient to warrant an EIA. Information on ancient woodland, ancient and veteran trees is set out in Natural England/Forestry Commission [standing advice](#).

We therefore recommend that advice is sought from your ecological, landscape and soils advisers, local record centre, recording society or wildlife body on the local soils, best and most versatile agricultural land, landscape, geodiversity and biodiversity receptors that may be affected by the proposed development before determining whether an EIA is necessary.

Should you determine that an EIA is not required in this case, you should ensure that the application is supported by sufficient biodiversity, landscape and other environmental information in order for you to assess the weight to give these material considerations when determining the planning application.

Should the proposal be amended in a way which significantly affects its impact on the natural environment then, in accordance with Section 4 of the Natural Environment and Rural Communities Act 2006, Natural England should be consulted again.

Please note that this response relates only to the EIA screening consultation. Natural England may wish to provide advice should your authority consult us on any subsequent planning application and associated environmental assessments. Guidance on when to consult Natural England is [here](#).

Please send any new consultations, or any further information on this consultation to: consultations@naturalengland.org.uk.

Yours sincerely,

Mrs Sally Ireland
Consultations Team

20230668 Eastcourt Marshes Electricity Substation

Port of London Authority 19 July 2023

Thank you for consulting the Port of London Authority (PLA) on the above-mentioned request for a screening opinion in accordance with the Town and Country Planning Act (Environmental Impact Assessment) Regulations 2017 in respect of the proposed development at Eastcourt Marshes Electricity Substation, Mark Lane, Gravesend. I have now had the opportunity to review the submitted Environmental Screening Report and have the following comments to make.

The proposed development relates to one new shaft headhouse and one new cable sealing end compound in Gravesham as one element of the TKRE Cable Tunnel Replacement Project. The project relates to a new bored tunnel under the River Thames constructed to house new cross linked polyethylene (XLPE) cables with associated new infrastructure proposed either side of the River Thames in Tilbury and Gravesend. On the tunnel itself table 2.1 (New Bored Cable Tunnel – Summary of Key Characteristics) states that the depth of the tunnel will be approximately 50m with a width of 4m. This will unlikely affect the river channel above it. However if for any reason the proposed depth cannot be achieved or maintained then the PLA must be reconsulted to establish that the Tidal Thames remains unaffected.

The potential construction effects section (paragraph 3.8.16) states that there is the potential for construction to affect human and controlled waters receptors and for the ground conditions to impact on the design of the proposed development. Potential impacts listed include possible dewatering of the tunnel or the spoil during construction, and the discharge of water from dewatering to surface watercourses. To note if any new outfall to the tidal Thames is required as part of the works a River Works Licence (RWL) will be required with the PLA and the PLA's Statutory Consents and Compliance Team should be contacted at lic.app@pla.co.uk. Further information on this will be required in the forthcoming Drainage Strategy as part of any forthcoming planning application.

A key issue highlighted in the report is the requirement for the permanent disposal of the material/spoil removed from the tunnel during construction. Within the report it is highlighted that it is the applicant's preference that tunnel spoil will be removed by barge on the River Thames to reduce the number of HGVs on the wider road network, and that this will be reviewed further as part of the Environmental Appraisal Report (EAR). Paragraphs 2.3.12 and 3.9.29 of the report also state that some discussion has been held with the RSPB with regard to using excavated material in the formation of wetlands at RSPB Cliffe Pools to contribute to the creation of new habitat, or to support other habitat restoration and wetland projects in the Tilbury area. In principle this preference is supported. Paragraph 3.2.1 also states that it is the applicant's preference to remove the tunnel spoil from the construction site at Tilbury to and from existing jetty structures only. As part of the forthcoming planning application further detail will be required on this preference within the EAR, as well as the Transport Assessment and Construction Environmental Management Plan (CEMP) particularly with regard to maximising the use of the river as part of the construction stage, rather than by road. This should include details on any communication with operators/owners of existing river structures that may be utilised for the proposed development and any implications of barge

movements on marine traffic. Furthermore it is noted in paragraph 3.7.12 that potential vessel emissions will also be considered in the forthcoming Air Quality Assessment, this is supported.

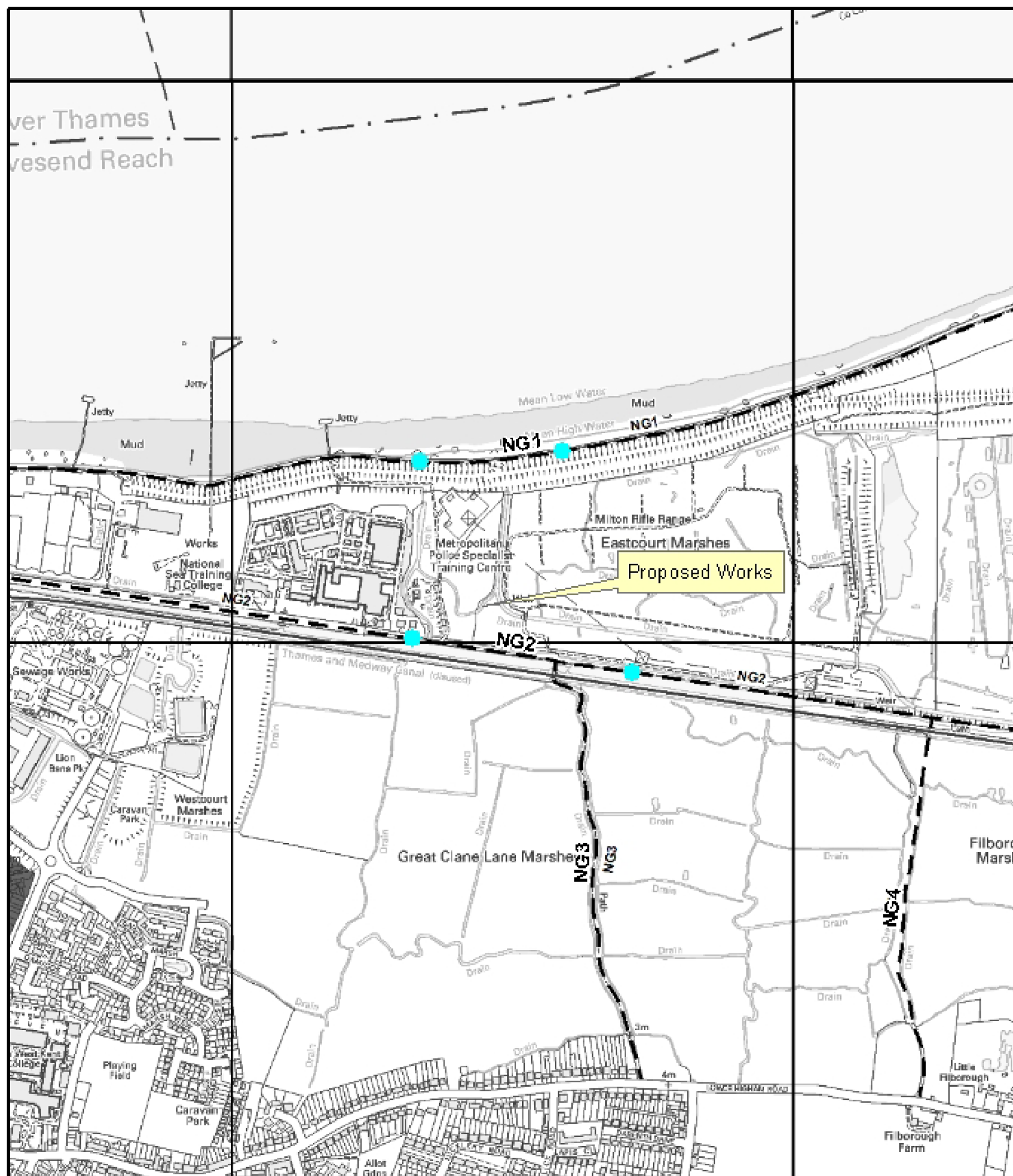
On other environmental matters, within the noise and vibration chapter it is noted that this does not specifically consider non-human sensitive receptors. Given the location in relation to various European designated sites it is considered that this must be addressed as part of the forthcoming planning application. It is noted that there are references elsewhere in the report on noise, for example paragraph 3.2.26 on underwater sound disturbance effects to marine mammals and fish, states that based on information available at this stage the applicant considers it unlikely that the proposed activities will generate sufficient underwater sound to exceed ambient levels - however, once full design details are available the impact pathway will be subject to further assessment to confirm that this. The PLA in principle support this approach.

Table 3.1 (Key Ecological Receptors) outlines the geographical scale of biodiversity for various receptors. Within this table the following amendments are required:

- Wintering and wading birds: As these are designated features of the Thames Estuary and Marshes Ramsar and Special Protection Area (SPA), it is considered that this would make them of international importance
- Breeding birds: As these are designated features of the associated Site of Special Scientific importance (SSSI), it is considered that this would make them of national importance

In addition to highlight that the most significant issue relating to birds is that of disturbance because of construction activities, including any potential effects of the noise and vibrations tunnelling activities on underwater feeding waterfowl and marine mammals. This must form a key consideration in the Habitats Regulations Assessment (HRA) as part of the forthcoming planning application. Furthermore to note that depending on the location, any mitigation/compensation identified in the HRA may have additional implications for the PLA.

Finally paragraphs 2.3.38 – 2.3.39 include some information on the decommissioning of existing assets, stating that decommissioning of the existing tunnel and associated infrastructure does not form part of this project. However the report also states that it is expected that the existing cables and cable joints within the existing tunnel will be purged of their oil and sent for recycling and that further tunnel inspection work will be required to assess this. To confirm the PLA consider that, if the existing tunnel is no longer going to be used, the existing tunnel and infrastructure should be removed from the river bed.



Key

- — Footpath
- |— Bridleway
- ∨—∨ Restricted Byway
- ∨ Byway Open to All Traffic

EXTRACT OF THE DEFINITIVE MAP OF PUBLIC RIGHTS OF WAY FOR THE COUNTY OF KENT

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DS

Checked by:

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03/07/2023

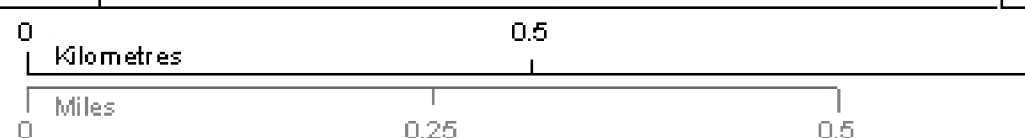
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20230668 Eastcourt Marshes Electricity Substation Mark Lane

Environment Agency 4 July 2023

Thank you for your email.

We no longer respond to screening opinions and so have no comments to make.

Requirement for an Environmental permit

The [insert element of development that may require permit] associated with this development will require an Environmental Permit under the Environmental Permitting (England & Wales) Regulations 2016, from the Environment Agency, unless an exemption applies. The applicant is advised to contact the Environment Agency on 03708 506 506 for further advice and to discuss the issues likely to be raised. You should be aware that there is no guarantee that a permit will be granted. Additional 'Environmental Permitting Guidance' can be found at: <https://www.gov.uk/environmental-permit-check-if-you-need-one>.

Thurrock Council



Development Management, Civic Offices, New Road,
Grays Thurrock, Essex RM17 6SL

Kate McGregor
National Grid PLC
1-3 Strand
London
WC2N 5EJ

Our Ref: 23/00681/SCR

E-Mail: dm@thurrock.gov.uk

Date: 7th July 2023

BY EMAIL

Dear Kate

Town and Country Planning (Environmental Impact Assessment) Regulations 2017 (as amended)– Request for the Screening Opinion of the Local Planning Authority

Proposal:

Request for Environmental Impact Assessment (EIA) Screening Opinion pursuant to Part 2 (6) of the Town and Country Planning (Environmental Impacts Assessment) Regulations 2017 (as amended): National Grid TKRE tunnel project from Tilbury to Gravesend.

Location:

National Power PLC, Tilbury Power Station, Fort Road, Tilbury, RM18 8UJ.

I refer to your recent email request, dated 2nd June 2023, for a Screening Opinion pursuant to Part 2 (6) of the above regulations. You have kindly agreed to an extension of time for determination until Friday 7 July 2023 via Part 2 (6)(6)(b) of the Regulations.

Having undertaken the Environmental Impact Assessment (EIA) screening assessment process (below) the local planning authority considers that the proposal would be unlikely to result in significant effects on the environment. Consequently, the local planning authority has determined as follows:

That an EIA is not required.

I can confirm that in accordance with the Regulations a copy of this decision will be placed

on Part 1 of the Planning Register. Should you have any further queries relating to this matter please do not hesitate to contact me via the email address above.



Nina Hicks
Planning Officer
Place Directorate

EIA SCREENING PROCESS

Town and Country Planning Act 1990 (as amended)
Town and Country Planning (Environmental Impact Assessment) Regulations 2017
(as amended)

		Yes	No
1)	SCHEDULE 1 PROPOSAL?		✓
2)	SCHEDULE 2 PROPOSAL?	✓	
3)	SENSITIVE AREA LOCATION?		✓
	Land in a Site of Special Scientific Interest		✓
	National Park		✓
	The Broads		✓
	UNESCO World Heritage Site		✓
	Schedule Ancient Monument (SAM)		✓
	Area of Outstanding Natural Beauty (ANOB)		✓
	Special Protection Area (SPA)		✓
	Special Area of Conservation (SAC)		✓
	Ramsar wetlands of international importance.		✓
	<i>Although not formal sensitive area the following may be considered sensitive locations</i>		
	Severely contaminated land		✓
	Sites of major archaeological importance		✓
	Local Nature Reserves		✓
	SINCS or County Wildlife Sites		✓
	Registered Parks and Gardens		✓
	Coastal Protection Belts		✓
	Ancient Landscapes		✓
	Country Parks		✓
	Regionally Important Geological Sites		✓
	Areas close to water boreholes		✓
	Within river corridors	✓	

	Sea defences		✓
	National Trust sites		✓
	Air Quality Management Area		✓
4)	DOES THE PROPOSAL MEET SCHEDULE 2 THRESHOLDS AND CRITERIA?		
	1. AGRICULTURE AND AQUACULTURE		
	Projects for the use of uncultivated land or semi natural areas for intensive agricultural purposes (> 0.5 hectares)		✓
	Water management projects for agriculture including irrigation and land drainage projects (> 1 hectare)		✓
	Intensive livestock management (> 500 m ²)		✓
	Fish farming (> 10 tonnes per year)		✓
	Reclamation of land from the sea		✓
	2. EXTRACTIVE INDUSTRY		
	Quarries and mining all development		✓
	Extract by fluvial or marine dredging		✓
	Deep drillings for geothermal, water, nuclear waste (>1 ha, or within 100m of controlled water for nuclear)		✓
	Surface installations for extracting coal, petrol, gas and ores (> 0.5 ha)		✓
	3. ENERGY INDUSTRY		
	Installation for production of electricity, steam and hot water (> 0.5 ha)		✓
	Installation for carrying gas, steam and hot water (> 1 ha)		✓
	Storage of gas and storage of fossil fuel (> 500m ² or within 100m of controlled water)		✓
	Industrial briquetting of coal and lignite (> 1,000 m ²)		✓
	Installation for processing & storage of radioactive waste (> 1,000 m ²)		✓
	Installations for hydroelectric energy projection (> 0.5 megawatts)		✓
	Installations for the harnessing of wind power for energy production (> 2 turbine or hub height of any turbine >15 metres in height)		✓
	Installations to capture carbon dioxide		✓
	4. PRODUCTION & PROCESSING OF METALS (> 1000 m ²)		✓
	5. MINERAL INDUSTRY (> 1000 m ²)		✓
	6. CHEMICAL INDUSTRIES		
	Production of pesticides, chemicals pharmaceutical products, paint, varnishes etc (floor area > 1,000 m ²)		✓
	Storage facilities for petroleum or petroleum products (any building/structure > 0.05 ha or > 200 tonnes stored at a time)		✓
	7. FOOD INDUSTRY		
	Manufacture of vegetable/animal oils/fats (> 1000 m ²)		✓
	Packing and canning of animal/vegetable goods (> 1000 m ²)		✓

	Manufacture of dairy products (> 1000 m ²)		✓
	Brewing and malting (> 1000 m ²)		✓
	Confectionary and syrup making (> 1000 m ²)		✓
	Animal slaughter (> 1000 m ²)		✓
	Starch manufacturing (> 1000 m ²)		✓
	Fish meal/oil factory (> 1000 m ²)		✓
	Sugar factory (> 1000 m ²)		✓
	8. TEXTLE LEATHER WOOD AND PAPER		
	Industrial production of paper/board (> 1000 m ²)		✓
	Washing, bleaching and dying of fibres/textiles (> 1000 m ²)		✓
	Tanning plants (> 1000 m ²)		✓
	9. RUBBER INDUSTRY		
	Manufacture & treatment of elastomer based products (> 1000 m ²)		✓
	10. INFRASTRUCTURE PROJECTS		
	Industrial estate developments (where area of development > 0.5 ha)		✓
	Urban development projects (> 1 ha which is not dwelling house development, or, > 150 dwellings, or > 5ha for overall development)	✓	
	Transshipment facilities and intermodal terminals (> 0.5 ha)		✓
	Railways (> 1 ha)		✓
	Airfields (> 1 ha, or includes extension to a runway)		✓
	Roads (> 1 ha)		✓
	Ports and Harbours (> 1 ha)		✓
	Canals and flood relief works (> 1 ha)		✓
	Oil and gas pipelines/installations (> 1 ha, or pressure to 7 bar)		✓
	Coastal work to combat erosion and associated works		✓
	Groundwater abstraction (> 1 ha)		✓
	Works to transfer of water resources between river basins (> 1 ha)		✓
	Motorway service areas (> 0.5 ha)		✓
	11. OTHER PROJECTS		
	Permanent racing and test tracks for motorised vehicles (> 1 ha)		✓
	Installations for disposal of waste (incineration or >0.5 ha or within 100m of controlled waters)		✓
	Waste water treatment plans (> 1,000 m ²)		✓
	Sludge deposition sites, storage of scrap/vehicles (area > 0.5 ha or within 100m of controlled waters)		✓
	Testing engines, turbines and reactors (> 1,000 m ²)		✓
	Installation of artificial fibres (> 1,000 m ²)		✓
	Installation for recovery of destruction of explosives (> 1,000 m ²)		✓
	Knackers Yard (> 1,000 m ²)		✓
	12. TOURISM AND LIESURE		
	Ski runs, ski lifts and cable cars (> 1 ha or height > 15m)		✓

	Marina's (> 1,000 m ²)		✓
	Holiday villages/theme parks (> 0.5 ha)		✓
	Permanent camp sites and caravan sites (> 1 ha)		✓
	Golf courses and associated developments (> 1 ha)		✓
	13. CHANGES AND EXTENSIONS		✓
	Changes to or extensions to development in Schedule 1		✓
	Changes to or extensions to development in Schedule 2		✓
	New methods or products within Schedule 1		✓

Determination of whether Schedule 1 or Schedule 2 Development

Your request refers to the erection of a new terminal pylon including overhead line modifications, a bored cable tunnel, tunnel headhouse and sealing end compounds. Although the development would be located adjacent to a proposed Site of Special Scientific Interest (SSSI) boundary, no permanent development would be within this area. The table at Schedule 2 of the Regulations describes in Column 1 (10) 'Infrastructure projects' and sub-section (b) refers to 'Urban development projects, including the construction of shopping centres and car parks, sports stadiums, leisure centres and multiplex cinemas. The corresponding Column 2 (Applicable thresholds and criteria) refers at sub-section (i) to *"the development includes more than 1 hectare of urban development which is not dwellinghouse development"*. Therefore, the local planning authority determines that the proposal is a Schedule 2 development.

In accordance with the Regulations, it is necessary to consider whether the development would lie within a "sensitive area" as defined at Part 1(2) of the Regulations. The proposal is not within a "sensitive area", although the site is within the 'Impact Risk Zones' drawn around SSSIs / Ramsar / SPAs close to the site.

Screening Opinion

Schedule 3 of the 2017 Regulations sets out the selection criteria for screening developments that may require an EIA. The key criteria are:

1. characteristics of development;
2. location of the development; and
3. types and characteristics of the potential impact.

On the basis of the submitted request, the local planning authority considers that the proposal is Schedule 2 development, but would not have the potential to generate significant environmental effects in the location proposed so as to require the submission of an EIA. The conclusion is that the proposal **DOES NOT REQUIRE EIA**.

The reasons for this conclusion, based upon the commentary set out in your request for a Screening Opinion, are set out below:

Characteristics of development

1. The characteristics of development must be considered with particular regard to:
 - (a) the size and design of the whole development - *the proposal would not give rise to any significant impacts;*
 - (b) cumulation with other existing development and/or approved development - *the proposals would not give rise to any significant cumulative impacts;*
 - (c) the use of natural resources, in particular land, soil, water and biodiversity - *there would be no significant new use of natural resources, with no resources of special importance to land, soil, water or biodiversity being affected;*
 - (d) the production of waste - *the proposals are unlikely to produce significant levels of waste;*
 - (e) pollution and nuisances - *the proposals would not give rise to any significant pollution or nuisance;*
 - (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 - *the proposed development would not give rise to any significant increased risk of accidents or disasters;*
 - (g) the risks to human health (for example, due to water contamination or air pollution) - *the proposals would not give rise to any significant increased risk to human health.*

Location of development

2. The environmental sensitivity of geographical areas likely to be affected by development must be considered, having regard, in particular, to –
 - (a) the existing and approved land use – *land uses on the site are considered to be of a relatively low environmental sensitivity;*
 - (b) the relative abundance, availability, quality, and regenerative capacity of natural resources (including soil, land, water, and biodiversity) in the area and its underground - *the proposed development would not result in significant effects on any rare or threatened natural resources;*
 - (c) the absorption capacity of the natural environment, paying particular attention to the following areas—
 - (i) wetlands, riparian areas, river mouths – *would not be significantly affected by the proposals;*
 - (ii) coastal zones and the marine environment – *no significant impacts would be likely;*
 - (iii) mountain and forest areas - *no significant impacts would be likely;*
 - (iv) nature reserves and parks – *no significant impacts would be likely;*
 - (v) European sites and other areas classified or protected under national legislation - *although the site is within the 'Impact Risk Zones' drawn around*

SSSIs / Ramsar / SPAs located close to the site it is not considered that the development would give rise to significant effects on these receptors;

- (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 – *the proposed development would be unlikely to give rise to significant effects;*
- (vii) densely populated areas - *the proposals would be unlikely to give rise to significant effects;*
- (viii) landscapes and sites of historical, cultural, or archaeological significance - *the proposed development would be unlikely to give rise to significant effects.*

Characteristics of the potential impact

3. The potential significant effects of development must be considered in relation to criteria set out under paragraphs 1 and 2 above, and having regard in particular to –
 - (a) the magnitude and spatial extent of the impact (for example geographical area and size of the population likely to be affected) - *the proposed development would be unlikely to give rise to significant effects at any scale;*
 - (b) the nature of the impact - *the proposals would be unlikely to give rise to significant effects with reference to the nature of impact;*
 - (c) the transboundary nature of the impact - *the development would be unlikely to give rise to significant effects with reference to the transboundary nature of impact;*
 - (d) the intensity and complexity of the impact - *the proposed development would be unlikely to give rise to significant effects with reference to the intensity and complexity of the impact;*
 - (e) the probability of the impact - *the development would be unlikely to give rise to any significant effects;*
 - (f) the expected onset, duration, frequency, and reversibility of the impact - *the proposed development would be unlikely to give rise to new significant effects;*
 - (g) the cumulation of the impact with the impact of other existing and/or approved development - *the proposals would be unlikely to give rise to significant effects*
 - (h) the possibility of effectively reducing the impact - *the proposed development would be unlikely to give rise to any new significant effects.*

With reference to proposed mitigation measures, the local planning authority has taken into account the information to support EIA screening as set out within of your Environmental Screening Report (June 2023) and in accordance with Part 2, 5 (5) (b) of the Regulations are satisfied that features and measures are in place to potentially avoid or prevent what might otherwise have been significant environmental effects:

Conclusion

Overall, based upon the above assessment, it is considered that the proposal would not result in significant environment effects and therefore an EIA is not required for this

proposed development.

Please note that this opinion is given on the basis of the information presented in your covering letter and additional Environmental Screening Report dated June 2023 only.

I trust that these comments are of assistance. Please note that this letter refers to the 2017 Regulations only and this Screening Opinion is given without prejudice to the consideration and determination of any future planning application.

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