



Environmental Protection COMMENTS

Case Number	20211383
Case Officer	Mr Peter Price
Address	Imperial Wharf, Clifton Marine Parade, Gravesend, Kent, DA11 0DY

Proposal	Screening and Scoping Request in respect of a proposed planning application for the installation of two additional bitumen tanks, load out gantry, the installation of a bitumen emulsion plant and alternative car parking on land at Imperial Wharf, Clifton Marine Parade, Gravesend, Kent, DA11 0DY
Consultation Expiry Date	30 November 2021
Date of Response	1 December 2021

Please note this response supersedes our previous response dated 18 November.

This Service considers that the proposal would meet the criteria for a Schedule 2 Development under description 6c of that Schedule to the Town and Country Planning (Environmental Impact Assessment) (EIA) Regulations 2017.

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We have therefore given consideration to whether the proposal is likely to have significant effects on the environment to establish whether we feel an Environmental Impact Assessment is required, having regard to the Schedule 3 selection criteria relevant to this services remit.

This Service's primary concerns relate to the potential for widespread odour nuisance arising from the cumulative impact of additional bitumen tanks and the introduction of a bitumen emulsion plant. Noise and contaminated land are also relevant considerations.

Whilst we acknowledge the odour control measures/mitigation in place at the existing site, and that they are proposed to be replicated for the proposed additional tanks, a strong smell of bitumen arising from the existing site does occur and so these measures are, like most odour control methods, not 100% effective.

It is difficult however to predict the potential significance of such impacts in terms of frequency, intensity, geographical reach, etc. and therefore difficult to gauge whether they could be considered as significant environmental impacts under the EIA Regs. In any case, we would need to be assured that sufficient control measures were in place to ensure that best practicable means are employed.

We note however the report from PDE Consulting Ltd on behalf of FM Conway Ltd dated Nov 2021 recognises that odour, noise and contaminated land are likely to be of concern to this service and they confirm that appropriate reports would be forthcoming with any subsequent application, which we would welcome and expect, and seek to require by way of condition should an application be forthcoming and permitted.