

Richard Limmer  
North East Lincolnshire Council (Planning)  
New Oxford House  
2 George Street  
Grimsby  
North East Lincolnshire  
DN31 1HB

9 December 2022

Dear Mr Limmer,

**LAND AT NEW CLEE SIDINGS, SALVESEN ROAD, GRIMSBY, DN31 3FS - APPLICATION FOR SCREENING OPINION PURSUANT TO TOWN AND COUNTY PLANNING (ENVIRONMENTAL IMPACT ASSESSMENT) (ENGLAND) REGULATIONS 2017 (AS AMENDED)**

On behalf of our client, AquaCultured Seafood Ltd, we submit under Regulation 6 of the Town and Country Planning (Environmental Impact Assessment) Regulations 2017 ("the Regulations") a request for a Screening Opinion in respect of their proposals ("the Proposed Development") for the development of land at the former New Clee Sidings, Salvesden Road ("the Site") for approximately 40,042sqm GIA of floorspace and associated works to provide for an enclosed aquaculture facility for the cultivation and processing of salmon (Use Class Sui Generis).

In accordance with the Regulations, this letter provides the following information to allow you to determine whether the above scheme requires an Environmental Impact Assessment ("EIA"):

- A Site Location Plan (**Appendix 1**) and description of the site;
- A description of the nature and purpose of the development (below);
- A Proposed Site Plan (Ref: 21193-UMC-0100-SI-DR-A-0002 [B]) (**Appendix 2**);
- Proposed Main Building Elevations (Ref: 21193-UMC-0100-01-DR-A-0103 [B]) (**Appendix 3**);
- Summary of Ecological Work (**Appendix 4**); and
- A Schedule of Application Documents (**Appendix 5**).

**SITE DESCRIPTION**

The Site comprises a relatively flat and triangular plot of approximately 12.14ha located within the administrative boundary of North East Lincolnshire Council ("NELC" or "the Council"). The Site is situated in the wider urban conurbation of Grimsby and Cleethorpes which, located on the southern bank of the Humber Estuary, has historically been the nexus of the fishing industry in the UK. **Figures 1 and 2** below shows the Site location and its context.

The Site is located in the defined operational port of Grimsby as per the adopted and up-to-date Local Plan (**Policy 7**). The Town and Country Planning (General Permitted Development) (England) Order 2015 (as amended) permits certain development within operational ports without the need for planning permission.



Figure 1: Aerial View of the Site (Source: Google Maps)

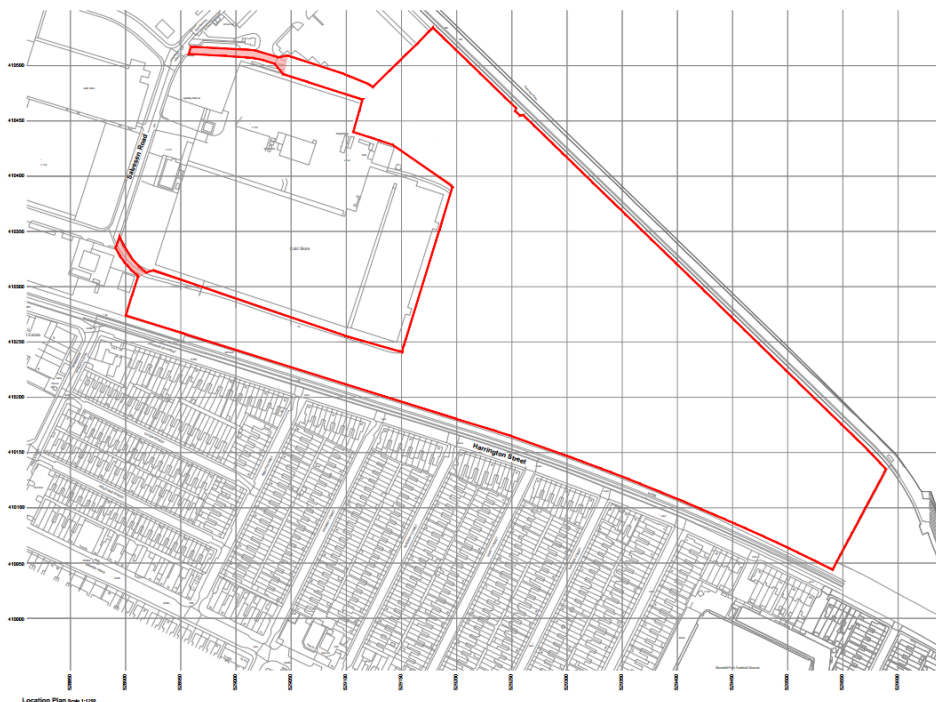


Figure 2: Site Location Plan

There are no existing buildings on the Site. From the Council's records, the Site has no available planning history. The Site has previously been reclaimed and cleared in the early 1990s from its historic use as rail sidings (see **Figure 3**) and currently has no built development.



*Figure 3: Historic Photographs of the Site in the 1930s (Source: Associated British Ports)*

Vehicular access to the Site is via Marsden Road to the west of the Site and from Wickham Road to the northwest of the Site. Both roads provide access to the wider network of internal roads within Grimsby Docks which in turn provide highway access to the A180 and wider strategic road network.

To the west and northwest, the Site is bordered by the existing industrial and port development on Grimsby Docks. These are comprised of a mix of open storage and warehousing with a definitive industrial character. Immediately adjoining to the west and northwest is the Seafood Village approved in 2010 and the Lineage cold store. The latter was granted planning permission in March 2022 for demolition of existing ambient warehouse, loading dock, cold store 2 and maintenance garage, and erection of replacement building for B2/B8 and ancillary office floorspace under use Class E with additional access, vehicle maintenance workshop, parking, together with associated hardstanding, landscaping, relocated main site entrance and ancillary works (Ref. No. DM/1022/21/FUL)

The north of the Site is bounded by the sea wall beyond which is the Humber Estuary.

Directly to the south of the Site is the railway line that runs from Cleethorpes station to New Clee station. To the south of the Site and to the opposite side of Harrington Street the area is largely residential in character, comprising predominantly of two storey terraced houses, interspersed with local shops and amenities. It should be noted that the Site is noticeably elevated above Harrington Street. Grimsby Town Football Club is situated to the south of the Site amongst the wider residential development.

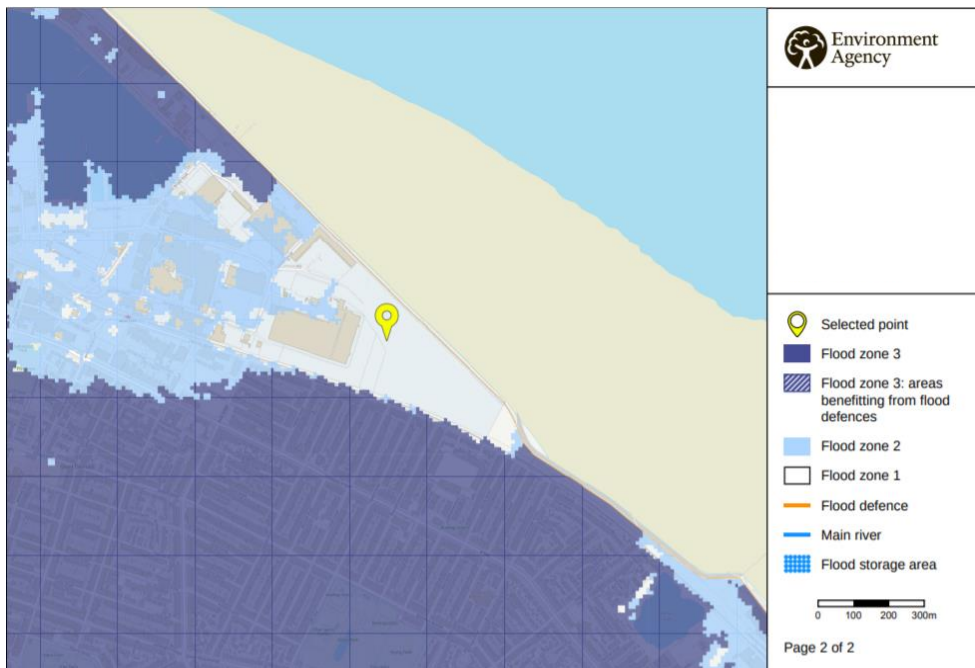
There are no listed buildings or structures on or near the Site; the nearest heritage asset being the Grade II listed Barcroft Junior School approximately 300 metres to the South within the residential area. The Site is also not located within or adjacent to a conservation area or an identified area of archaeological importance.

The Site itself has no statutory ecological designations but is designated as a Local Wildlife Site in the North East Lincolnshire Local Plan (2018) indicating the Site had at the time of designation or may continue to have some wildlife value. The Site is largely open/cleared scrub with some sporadic self-seeded trees, the main

group of which is located to the southern boundary with the railway. From the information available no trees on Site are the subject of a Tree Preservation Order (“TPO”).

The Humber Estuary to the north is designated as a RAMSAR Site, Site of Special Scientific Interest (“SSSI”), Special Area of Conservation (“SAC”) and Special Protection Area (“SPA”).

The Site is in Flood Zone 1 as defined by the Environment Agency Flood Maps (**Figure 3**) and thus is at low risk of flooding. The wider urban area surrounding the Site to the south and west fall within Flood Zone 2 and 3.



*Figure 3: Flood Map Extract (Source: Environment Agency)*

The Council’s Strategic Flood Risk Assessment (“SFRA”) from November 2011 does not identify the Site within Flood Zone 2 or 3. However, it is noted the Site is a ‘dry island’ surrounded by areas in Flood Zones 2 and 3.

The Site has excellent connectivity by road, rail and sea being sited in a strategic location at the mouth of the Humber. The M180/A180 dual carriage links the wider dock entrance directly to the M18 and M1. There are also quayside rail links with link the port to the national railway network.

## PROPOSED DEVELOPMENT

The Proposed Development represents a circa £75m investment and comprises comprehensive development of the Site to provide circa 40,000sqm of Sui Generis floorspace and associated plant/infrastructure to provide for an enclosed aquaculture facility producing approximately 5,000 tonnes gross of whole fish per annum when fully operational. The proposed development comprises of the following:

- Construction of approximately 40,042sqm building;
- Ancillary plant and processing, gatehouse, mechanical and electrical buildings;
- Dedicated area for bio security and disinfection;

- Two points of secure Site access;
- Internal access and maintenance roads;
- 77 car parking spaces;
- 3 loading bays; and
- Ancillary and associated works.

The main facility is proposed to be a linear shaped clad building, situated to the north of the Site, with a smaller ancillary mechanical and electrical building located to the northwest of the Site. The proposed main building is to be 8m clear internal to underside of haunch, with a maximum external ridge height of 13.33m.

A Proposed Site Layout Plan (Ref: 21193-UMC-0100-SI-DR-A-0002 [B]) and Proposed Main Building Elevations (Ref: 21193-UMC-0100-01-DR-A-0103 [B]) are provided at Appendix 2 and 3.

The layout of the Site is dictated by the operational requirements of the aquaculture facility. As such, the proposed layout represents the optimum layout for the Site after factoring in site constraints and the proposals relationship with the surrounding area.

The areas to the south and southwest of the main facility are proposed for car parking, loading bays and a dedicated area for biosecurity and disinfection.

77 car parking spaces are proposed along with 3 loading bays. It is anticipated the proposed development will generate approximately 2 two-way HGV Feed/LOX vehicle movements 5 days per week and 3 HGV two-way vehicle movements over a 5-day working week period. The Site will be accessed off Salvesen Road via a new shared access point, the Site is proposed to be manoeuvred via a one-way system with segregated access points for HGVs and cars.

The New Cleve aquaculture facility will contain a marine recirculating aquaculture system ("RAS") in both freshwater and saltwater tanks. The freshwater tanks support the early stages of the Salmon life cycle and the larger saltwater tanks provide the environment for the salmon to grow to 4-5kg in size. The facility will also house associated systems such as water treatment plant, a fish processing line and a feed storage unit.

## **REQUIREMENT FOR AN ENVIRONMENTAL IMPACT ASSESSMENT**

This letter sets out the process by which it is determined whether an EIA is required for the development, with reference to Schedules 1, 2 and 3 of the Regulations.

Firstly, it is considered whether the development qualifies as Schedule 1 development. Secondly, it is considered whether the development qualifies as Schedule 2 development. This is done by reference to the selection criteria for screening Schedule 2 development, as set out in Schedule 3.

### Schedule 1 Development

EIA is mandatory for projects listed in Schedule 1 of the EIA Regulations. The Proposed Development does not fall within Schedule 1 of the EIA Regulations and, therefore, does not automatically require an Environmental Statement to be completed.

### Schedule 2 Development



An EIA is required for a Schedule 2 development only if it is considered that the project may create significant environmental effects. If a development is of a type listed in Schedule 2 of the Regulations, and exceeds the relevant thresholds and criteria outlined in the second column of Schedule 2 (also known as the 'exclusion' or 'applicable' thresholds and criteria), the Local Planning Authority ("LPA") is required to undertake screening in order to consider whether it is likely to have significant effects on the environment, and therefore requires an EIA.

It is important to note that the thresholds outlined under Schedule 2 are broad indications of the projects that can normally be readily discarded from detailed EIA screening consideration, rather than being the thresholds beyond which a development is automatically considered to be EIA development. For proposals that exceed the Schedule 2 thresholds, the development proposals should then be considered within the screening process on an individual basis, taking into account the selection criteria in Schedule 3 of the Regulations that are relevant.

In addition, if a development noted in Schedule 2 of the EIA Regulations is located in a 'sensitive area', it must always be screened on the need for an EIA, regardless of whether the thresholds are met. The Regulations define sensitive areas as including SSSIs, National Parks, The Broads, properties appearing on the World Heritage List, Scheduled Monuments, Areas of Outstanding Natural Beauty, and European sites for conservation.

The Regulations suggest EIA screening is required for intensive fish farming projects if the installation resulting from the development is designed to produce more than 10 tonnes of dead weight fish per year. The proposed development is intended to produce 5,000 tonnes gross of whole fish per annum and therefore falls within this category.

Additionally, The Humber Estuary immediately to the north of the Site is designated as a RAMSAR Site, Site of Specific Scientific Interest ("SSSI"), Special Area of Conservation ("SAC") and Special Protection Area ("SPA") and therefore falls into the 'sensitive area' category as defined in Regulation 2 (1). All development in, or partly in, such areas are required to be screened. Therefore, due to its potential impacts on the environment, the Proposed Development has been screened, considering the selection criteria in Schedule 3 of the Regulations.

The following section of this letter considers the likely impacts of the Proposed Development, with reference to the EIA Regulations Schedule 3 criteria, in order to determine whether the Proposed Development does or does not constitute EIA development.

### [Schedule 3 – Selection Criteria for Screening Schedule 2 Development](#)

In accordance with the Regulations, the Council must consider the characteristics of the development, its location and potential impact when determining whether a development is EIA development. These are considered in turn in the remaining sections of this letter.

#### *1. Characteristics of Development*

In relation to this matter, it is noted in the Regulations that the characteristics of development must be considered having regard, in particular, to:

##### *a) the size and design of the whole development;*

The Site comprises a relatively flat and triangular plot of approximately 11ha. At present, there are no existing buildings on the Site. The Site has previously been reclaimed and cleared in the early 1990s from its previous use as a rail sidings and currently has no built development.

The Proposed Development comprises comprehensive development of the Site to provide circa 40,042sqm of Sui Generis floorspace and associated plant/infrastructure to provide for an enclosed aquaculture facility with other associated works. The main building will also contain ancillary offices and logistics areas.

The main facility is a linear shaped cladded building, situated to the north of the Site, with a smaller ancillary mechanical and electrical building located to the northwest of the Site. Due to the low overall height compared to the length of the façade this is broken by the use of cladding colours and the steps to the façade along the sensitive southern façade.

The size, shape and layout of the Proposed Development has been dictated by the operational requirements on the aquaculture facility and designed to respond sensitively to the existing context of the surrounding area.

The Proposed Development is considered to be appropriate to this location. It will enable the delivery of a high-quality aquaculture facility whilst ensuring that the amenity of neighbouring properties is protected.

It is not considered that this development will lead to material impacts and specifically not impacts of a more than local nature. A suite of technical assessments and reports will be submitted as part of the application for the Proposed Development, which will consider the potential impacts of the Proposed Development during both construction and operational phases. Such documents will also detail any mitigation required to make the Proposed Development acceptable in planning terms. A list of proposed assessments and reports to be submitted as part of any application can be found at **Appendix 5**.

*b) cumulation with other existing development and/ or approved development;*

The Proposed Development is located within the defined operational port of Grimsby. The immediate area is one of commercial and industrial character, forming an extension to the Grimsby docks region of town.

We are aware of the development approved in March 2022 at Marsden Road for the demolition of existing ambient warehouse, loading doc, coldstore and maintenance garage and erection of replacement building for B2/B8 and ancillary office floorspace under use Class E with additional access, vehicle maintenance workshop, parking, together with associated hardstanding, landscaping, relocated main site entrance and ancillary works.

It is considered this development is not of a significant scale to need to be considered cumulatively with the Proposed Development and therefore the Proposed Development can proceed independently.

*c) the use of natural resources, in particular land, soil, water and biodiversity;*

The proposed construction and operational phases of the proposed development will use resources in terms of land, water and energy as would be expected for a development of this type.

Sustainable techniques and materials are to be employed in the construction of the Proposed Development, consistent with the objectives of the NPPF.

The Proposed Development will require approximately 1,000m<sup>3</sup>/day of freshwater and 1,000m<sup>3</sup>/day of salt water.

Freshwater will be provided via the existing ABP infrastructure, from their independent ground water supply boreholes at Grimsby Port. A new rising main will be constructed to connect the Site with the existing ABP water distribution network. The existing supply at Grimsby Port is capable of supplying the required volume of groundwater. Increasing the demand on the existing supply will not materially impact the quantity and quality of available water resources.

Saltwater will be abstracted from a borehole constructed at the Site, to target saline groundwater within the underlying Chalk and/or Limestone aquifers. A borehole constructed to target saline groundwater will not impact the quantity and quality of (fresh) water resources.

The potential impacts to both quantity and quality of water resources are low.

In addition to further details on water abstraction, an Energy & Sustainability Statement will be submitted in support of the planning application.

*d) the production of waste;*

Up to 1,000m<sup>3</sup>/day of effluent will be generated from the aquaculture process. The effluent will be treated to a very high standard, using the best quality water filtration technologies developed by AquaMaof to produce treated effluent that is very low in nutrients and suspended solids.

Effluent water will be treated and discharged with surface water through the AWA outfall located within the ABP/AWA ownership.

Dedicated areas for refuse will be provided to allow for adequate storage to suit the occupiers' operations. The proposed development will provide for the careful and sustainable disposal of waste during and post construction.

Modern methods of design and construction using prefabricated units will help to keep waste arising to a minimum. Post construction, the buildings will be provided with a dedicated area within the building for the provision of refuse and re-cycling facilities, tailored to operational requirements.

The Proposed Development can provide for the careful and sustainable disposal of waste during and post construction.

*e) pollution and nuisances;*

Consideration has been afforded to the potential for the Proposed Development to give rise to pollution and nuisance (such as noise, air quality, water quality, and light) and the potential effects of such impacts on human and other environmental receptors. These matters are considered in more detail in Section 3 below.

Construction phase environmental impacts will be controlled by the use of best practice construction methods, including agreed construction working hours, maintenance of construction plant and dust management, to be implemented as part of a Construction Environmental Management Plan ("CEMP"). It is important to note that construction effects will be temporary.

The Proposed Development is not associated with hazardous substances or toxic emissions to air.

*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;*



No processes involving hazardous substances or potentially dangerous activities are proposed onsite.

During the construction phase, the contractor would implement measures in accordance with Health and Safety legislation/requirements, and best practice to minimise the risks of accidents that would have effects on people or the environment.

The Site is in Flood Zone 1 and thus is at a low risk of flooding. The wider urban areas surrounding the Site to the south and west fall within Flood Zone 2 and 3. Any required mitigation measures to manage flood risk impacts will be identified in the Flood Risk Assessment that accompanies the planning application.

No significant risks of major accidents or disasters have been identified.

*g) the risks to human health (for example, due to water contamination or air pollution).*

There are no anticipated risks to human life associated with water or other contamination or air pollution. Appropriate assessments will, however, be undertaken and submitted to the LPA, together with appropriate mitigation measures to take place if subsequent risks are identified. A list of appropriate assessments for the proposed development are included at **Appendix 5**.

In summary, it is not considered that the characteristics of the Proposed Development would give rise to any significant impacts. It is further considered that any impacts arising from the Proposed Development are capable of being addressed within the suite of technical documents that would be submitted with the application.

## *2. Location of Development*

Schedule 3 of the EIA Regulations requires consideration of the location of the Proposed Development, and the environmental sensitivity of areas likely to be affected with 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 (including areas in which there has already been a failure to meet environmental quality standards, and densely populated areas).

These issues are considered in turn below.

### *a) Existing and Approved Land Use*

A site location plan is included at **Appendix 1** and a Proposed Site Plan is attached at **Appendix 2**.

The Site comprises of previously developed land located within an urban setting. It is located at the southern extent of the Operational Port Employment Area.

The Site is bordered by landscaped areas with a railway line situated to the south, separating the Site from a residential area.

The area surrounding the Site is characterised by light industrial buildings which form an extension to Grimsby Docks. The Docks provide a small number of private moorings within a marina but is a working port for the most part, specialising in seafood.

The Site has sporadic trees, the main group of which is located to the southern boundary with the railway. From the information available no trees on Site are the subject of a Tree Preservation Order.

The Proposed Development comprises approximately 40,042sqm GIA of floorspace and associated works to provide for an enclosed aquaculture facility for the cultivation and processing of salmon.

The proposed use of the Site is consistent with its allocation and the wider port character.

It is further considered that the Proposed Development would be compatible with the surrounding uses and would not have an adverse effect on the surrounding environment.

#### *b) Abundance, Availability, Quality and Regenerative Capacity of Natural Resources*

The design of the Proposed Development will protect the quality of natural resources.

The only identified impact due to the proposed aquaculture development is the potential impact to water resources. However, with the application of standard construction best practice, these impacts can be adequately mitigated. The potential impacts to both the quantity and quality of water resources are therefore low (or negligible) and not significant.

#### *c) Absorption Capacity of the Natural Environment*

In assessing this criterion particular attention is paid to a number of areas, including:

- 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 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 the 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.

The Site is located adjacent to a European Site (v). The Humber Estuary is a designated 'Special Protection Area (SPA)' and 'Site of Special Scientific Interest (SSSI)'.

The Site does not fall within an Air Quality Management Area (AQMA). As such, air pollution levels at the Site are currently not at risk of exceeding national air quality objectives.

Construction works have the potential to result in short term elevated levels of dust, noise and visual impacts, which could affect nearby sensitive receptors (including residential properties). Best practice construction measures will be applied to mitigate such potential adverse effects, through the implementation of a CEMP, which will be agreed with the LPA prior to the start of construction.

Where designations have been identified above, it is considered that there are appropriate mitigation measures in place, and therefore significant effects upon them are not anticipated.

### *3. Types and Characteristics of the potential impact*

Schedule 3 of the EIA Regulations requires consideration of the likely significant effects of the Proposed Development taking into account:

- a) the magnitude and spatial extent of the impact (e.g. geographical area and size of 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.

These issues are considered in turn below.

#### *a) Magnitude and spatial extent of the impact*

Most impacts will be restricted to the Site and its immediate surroundings. The effects will be no more than local and will not be of environmental significance.

A suite of technical reports will support the application, which will provide a detailed consideration of any potential impacts that the Proposed Development may have. The suggested scope of application material is included at **Appendix 5** of this letter.

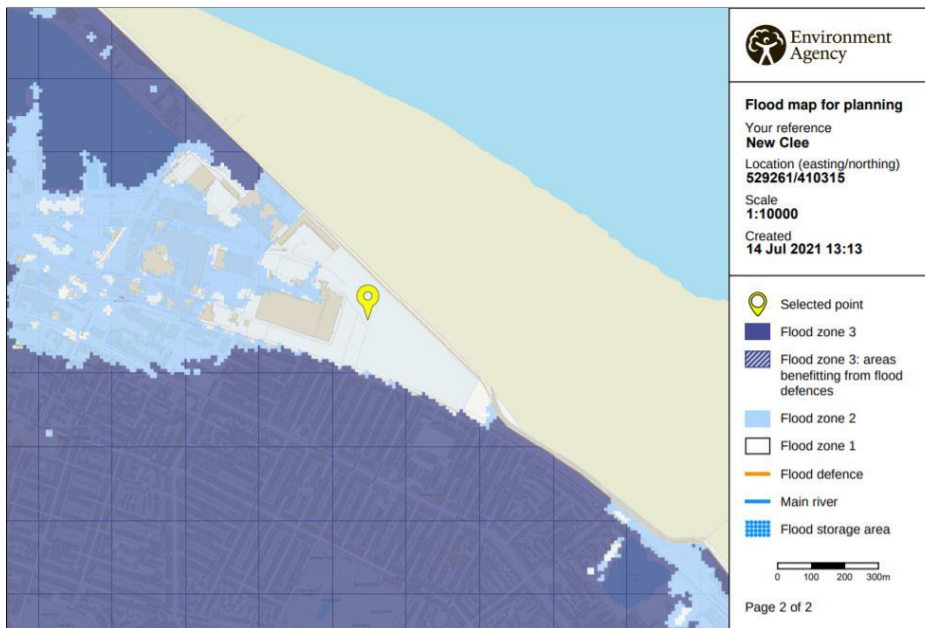
It is considered that any potential impacts can be adequately assessed by independent technical reports, without requirement for a full EIA, and if necessary mitigated.

#### *b) The nature of the impact*

A summary of potential impacts resulting from the Proposed Development is provided below.

##### *Flood Risk*

A copy of the Environment Agency Flood Map for Planning is included in the figure below which identifies the development site to be located within an area designated as Flood Zone 1 (low probability of flooding), with a less than 1 in 1000 annual probability of flooding in any year.



Flood data received from The Environment Agency shows that the development site has not been affected by historical flooding.

The nearest fluvial flood source is the River Freshney, which lies approximately 2.2km to the west of the site at its' nearest location. The Site is not shown to be prone to flooding from this potential flood source.

The south bank of the River Humber lies in close proximity to the northern site boundary. The Site is not shown to be prone to tidal flooding from a breach or overtopping of the estuary on the Flood Map for Planning.

A Flood Risk Assessment ("FRA") prepared by Alan Wood & Partners will be submitted to support the application. This will be undertaken in accordance with the National Planning Policy Framework ("NPPF") and the associated Planning Policy Guidance ("PPG"), to meet the requirements of the Environment Agency and the Lead Local Flood Authority.

The potential sources of flooding will be assessed as part of the FRA. The FRA will also identify appropriate flood risk mitigation measures, as appropriate, to ensure that the Proposed Development remains safe throughout its lifetime and does not increase the risk of flooding elsewhere.

Options for the sustainable management of surface water runoff will be identified and sustainable drainage systems (SuDS) will be implemented in line with best practice and current regulation and policy.

In summary, the FRA will demonstrate how any flood related impacts can be addressed such that no significant effects will result.

### *Traffic and Transport*

The Proposed Development includes 77 car parking spaces on site, including accessible spaces. Car parking will be designed to provide EV charging with 8 active spaces and 8 passive spaces. Provision has been made for dedicated secure and covered cycle parking.

Access and egress to the Site is proposed via two secure entrances from existing internal roads within Grimsby Docks; Marsden Road to the west of the Site and Wickham Road to the northwest of the Site.

The Site is proposed to be manoeuvred via a one-way system with segregated access points for HGVs and one for cars which have been suitably separated.

Information provided by the Applicant indicates that the proposed development, in addition to employees, there will be approximately 2 two-way HGV FEED/LOX vehicle movements 5 days a week and 3 HGV 2-way vehicle movements over a 5 day working week period.

It is expected that the feed lorries will use the wider network via the A180, M180. However, it is anticipated that the majority (80-90%) of the product lorries will remain within the Docks Network and not enter the wider network, with only 10-20% to Local Fish Processing Factories off the Estate at Europarc and New Clee areas.

The trips generated by the Proposed Development will be estimated using the TRICS / TRAVL database and a Transport Statement will accompany the application in order to allow full consideration of the impact of the Proposed Development on the local highway network.

A Framework Travel Plan will also be submitted as part of the application, which will provide an outline and best practice guide to promoting sustainable travel to / from the Site.

#### *Air Quality*

Whilst the Site is not located within an Air Quality Management Area, an Air Quality Improvement Plan will accompany the application to allow any potential impacts of the Proposed Development to be fully considered and assessed.

It is not considered likely that the Proposed Development will significantly increase traffic in the local area. Therefore, it is unlikely that the air quality effects of the development will be significant.

Construction phase effects are likely to be limited and associated with the construction of new buildings on site. The risk of dust impacts will be assessed to identify appropriate mitigation. With mitigation in place, it is considered likely that the construction phase effects will be not significant.

#### *Noise*

It is recognised that any proposal for new development would need to demonstrate that the amenity of neighbouring residents would be satisfactorily protected, including in terms of noise.

The proposed development will not generate any significant noise emissions. The existing treeline/landscaping along the Site's boundary with Harrington Street, separating the Site from the nearby residential properties, will be maintained and where possible enhanced.

Operational requirements necessitate the aquaculture facility to be a dark and quiet operation, kept away from any significant noise sources to avoid stresses to the fish.

Any proposed processing plant is intended to be placed in buildings with suitable noise reduction and control measures, ensuring no detrimental impacts on the surrounding environment.



Noise effects on nearby receptors during construction will be temporary in nature. Measures to ensure that sensitive receptors are afforded satisfactory protection, such as construction hour restrictions, will be detailed within the CEMP.

A Noise Assessment will be submitted with the planning application.

### *Ecology & Nature Conservation*

The Site is located adjacent to the Humber Estuary Special Area of Conservation (SAC), Special Protection Area (SPA) and Site of Special Scientific Interest (SSSI) and the Greater Wash SPA with marine components. At its closest point the boundaries of the Humber Estuary SAC, SPA and SSSI align and are located approximately 10m from the north east boundary of the Proposed Development Site.

The Site itself has no statutory ecological designations but is designated as the ABP Wasteland Local Wildlife Site (LWS) within the Local Plan. Several other LWS are present within a 2km radius of the Site, however none of which will be directly affected by the Proposed Development.

AECOM have been commissioned to provide ecological services to support the proposed planning application. To date, this has comprised the completion of an ecological desk study exercise and several ecological surveys, including wintering birds, breeding birds, botanical and UKHab classification condition surveys in order to collate data to determine the ecological baseline conditions of the Site.

The botanical survey confirmed that the Site conditions accord with the LWS description provided by the LPA, however, that there is a discrepancy between the habitats listed as occurring on Site, and the reasons given for designation. Wintering bird surveys found that the Site is not considered to be an optimal habitat for these species being generally scrubby and enclosed and based upon the survey results it is not 'functionally linked' to the SPA (or SSSI). Breeding bird surveys and the terrestrial invertebrate appraisal found the Site is likely to be of local value or importance at best.

Please refer to the full ecological summary found at **Appendix 4** for further details of the work completed and the key ecological constraints and likely potential ecological effects.

The following documents, prepared by AECOM, will be submitted to support the planning application:

- Habitats Regulations Assessment Screening Report and Appropriate Assessment
- Ecological Impact Assessment Report
- Updated PEA Report
- Ornithological Report.

### *Trees*

The Site has sporadic self-seeded trees, the main group of which is located to the southern boundary with the railway. From the information available no trees on Site are the subject of a Tree Preservation Order.

The proposals have sought to maintain any existing trees on Site where possible. A landscaping scheme including additional planting and soft landscaping is proposed.

An Arboricultural Assessment together with a detailed Landscaping Strategy, will form part of the planning application.

### *Energy and Sustainability*

The Proposed Development will incorporate a range of measures and features that will result in a development that conserves natural resources, limits pollution and environmental damage and is adapted to cope with the potential impacts of a changing climate, both during construction, and when in operation.

The Proposed Development incorporates Recirculating Aquaculture System (RAS) technology to provide maximum control, minimum maintenance and ultimate sustainability. The technology utilises several water treatment patents and filtering techniques to cut water consumption. By recirculating the culture water, the water and energy requirements will be limited to an absolute minimum.

In order to deliver an environmentally responsible building stock, an exemplar approach is being proposed based on low energy design principles. This approach involves energy demand minimisation through effective building form and orientation, good envelope design and proficient use of services; such that the buildings themselves are being used as the primary environmental modifier.

An Energy and Sustainability Statement prepared will be submitted as part of the planning application.

### *Construction Vehicle Trips*

Construction traffic routes will be agreed with the LPA and detailed within the submitted Framework Plan. It will also include traffic management proposals, which will reduce the impact of construction on the public highway.

A Framework Travel Plan will be submitted as part of the application.

### *Light Pollution*

Light pollution will be minimised by ensuring that the external lighting is designed to comply with relevant Institute of Lighting Engineers' guidance.

A Light Spillage Plan will be submitted as part of the planning application. The estate road, car park and service area will be illuminated during the hours of darkness to an appropriate lighting level for both operation and safety. The lighting lux levels will be kept to a minimum when adjacent to any natural habitats, and will avoid direct light spill into sensitive locations, in particular the Humber Estuary.

The fact that the building is located along the boundary of the Site adjacent to the Estuary with movements, car parking, etc concentrated to the south of the building will further mitigate any potential impacts.

Lighting impacts on all receptors will be minimised by careful design. A light spillage plan will be submitted with the planning application.

#### *c) The transboundary nature of the impact;*

No transboundary impacts are predicted.

#### *d) The intensity and complexity of the impact;*

Given the scale of the Proposed Development, both the intensity and complexity of impacts are generally predicted to be low. It is anticipated that any impacts can be satisfactorily mitigated through the planning process.

In addition, it is anticipated that there will be positive impacts as a result of the Proposed Development, such as the redevelopment of underutilised urban land.

*e) The probability of the impact;*

The probability of impacts occurring is low to medium, however it is not anticipated that the Proposed Development will give rise to any significant effects.

*f) The expected onset, duration, frequency and reversibility of the impact*

Most impacts will be permanent, however the majority of these are likely to be low in magnitude and / or beneficial. There will be some temporary impacts, limited to the construction phases of development. Those impacts can be satisfactorily dealt with by way of the usual controls operated by the LPA, such as through a CEMP.

*g) The cumulation of the impact with the impact of other existing and/ or approved development;*

As discussed above, the only recently approved surrounding development is the demolition of the existing warehouse and erection of a replacement building located at Marsden Road (Ref: DM/1022/21/FUL). This application is not considered to be of a significant enough scale that it would need to be considered cumulatively with the Proposed Development.

*h) The possibility of effectively reducing the impact*

The layout of the Proposed Development responds sensitively to the existing context of the surrounding area.

The frontage to the neighbouring residential area is to be softened and enhanced by sensitive use of landscaping and building orientation.

Noise impacts to nearby occupiers and residential properties will be limited due to the quiet nature of the proposed activity. Approach to the building will be via a landscape lined infrastructure.

Potential impacts to the Humber Estuary as a result of saltwater abstraction and/or effluent discharge are expected to be adequately mitigated through the application of standard construction best practice. As such, the potential impacts to both the quantity and quality of water resources are therefore low.

A suite of technical assessments and reports have been instructed, which will assess in detail the potential for impacts arising from the Proposed Development. These assessments will also consider any mitigation that is deemed to be necessary.

In summary, the extent of the impact of the Proposed Development is considered to be minimal. Whilst the intensity of the land use would be increased over the existing situation, this increase is considered to be appropriate given the context of the Site and its location.

The Proposed Development is not anticipated to have complex impacts which cannot be appropriately assessed in the technical documentation, which it to be submitted as part of the application in line with normal

validation requirements. It is proposed that a full suite of technical reports and supporting material is to be submitted as part of the application, which will provide all of the information required by the LPA to determine the application. The proposed scope of application documents is included at **Appendix 5**.

## CONCLUSION

Based on the analysis above, it is considered that an EIA is not required to be undertaken for the Proposed Development.

The Proposed Development does not fall within Schedule 1 of the EIA Regulations. The scheme does, however fall within the category of Schedule 2 section 1 (d) 'Intensive fish farming' of the Regulations and exceeds the applicable criteria by virtue of the tonnes of fish to be produced per year. In addition, the Site is situated adjacent to a defined 'sensitive area'. As such, and in accordance with the Regulations, EIA screening is required.

To consider whether the Proposed Development is likely to have significant effects on the environment, the scheme has been assessed against the criteria set out in Schedule 3 of the Regulations. When assessed against these criteria, we do not consider that the Proposed Development is of the scale and nature that requires an EIA. This is based on the assessment that the proposal is unlikely to have significant effects on the environment, taking account of potential mitigation. In accordance with the Regulations, where development is unlikely to give rise to significant environmental effects, an Environmental Statement is not required.

The application would be accompanied by detailed supporting documents, which would address the potential impacts of the development, propose mitigation measures in accordance with planning policy requirements and provide all of the information required by the LPA to determine the application. The scope of supporting documents to be submitted is set out **Appendix 5** of this letter.

North East Lincolnshire Council are invited to review the details as presented above and provide an EIA Screening Opinion in accordance with the EIA Regulations, to determine whether the Proposed Development is an EIA development. It is acknowledged that up to three weeks (21 days) (beginning from the date of receipt) is available to form a screening opinion.

We trust that the information supplied is sufficient for you to screen these proposals against the Town and Country Planning (Environmental Impact Assessment) Regulations 2017, and to confirm to us that an Environmental Statement is not required for this scheme. Should you require any further information to confirm that this is the case, please do not hesitate to contact either Gabriella Bexson ( ) or Craig Blatchford ( )

at this office.

Yours faithfully,

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**MONTAGU EVANS LLP**

Enc.

**APPENDIX 1: SITE LOCATION PLAN**





**MAINTAIN IT**

[illegible]

## **APPENDIX 2: PROPOSED SITE PLAN**



### **APPENDIX 3: PROPOSED MAIN BUILDING ELEVATIONS**





#### **APPENDIX 4: AECOM ECOLOGY LETTER**

9<sup>th</sup> December 2022

Issued to Montegu Evans:  
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Acting on behalf of:  
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90 Jermyn Street  
St. James  
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SW1Y 6JD

CC: Simon Dennis [simon@kddesign.org.uk](mailto:simon@kddesign.org.uk)  
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## New Clee Onshore Fish Farm: EIA Screening – Ecology

AECOM have been commissioned by Aquacultured Seafood Limited to support the proposed planning application for an onshore aquaculture facility (described in the EIA screening letter prepared by Montegu Evans and herein termed as the Proposed Development) by provision of ecological services. As detailed below, to date, this has comprised the completion of an ecological desk study exercise and several ecological surveys in order to determine the ecological baseline conditions of the Site. The key ecological constraints to and likely potential ecological effects of the Proposed Development are summarised in this letter provided to inform the Environmental Impact Assessment (EIA) Screening request.

Initial consultation was held with the local planning authority North East Lincolnshire Council (NELC) in October 2021 to discuss the scope of ecological work required to support a potential planning application for development of the Site.

**Table 1. Summary of ecology work completed to inform application**

Survey	Methodology	Timing	Outcomes
Extended Phase 1 Habitat Survey and Desk Study	Guidelines for Preliminary Ecological Appraisal (GPEA) Chartered Institute of Ecology and Environmental management (CIEEM) (2017).  Desk study exercise included collation of bird data to 10km radius.	August 2021 updated in February 2022	Reported within Preliminary Ecological Appraisal (PEA) Report (AECOM, March 2022). Several additional surveys recommended including those subsequently undertaken as stated.
Wintering Bird Survey	Twice monthly (high and low tide) counts which followed the principles of the Wetland Birds Survey (WeBS)  Survey Area comprised the Site and suitable (intertidal and coastal) habitat within 500m.	Monthly October 2021 – March 2022	Full detailed ornithological report including results of all bird surveys to be prepared. Summary of headline results provided below.
Breeding Bird Survey	Five repeat breeding bird surveys (BBS) have been completed following the Common Birds Census (CBC) method (following Marchant, 1983). Survey Area comprises the Site and adjacent habitat.	Early April to July (inclusive) 2022.	
Botanical Survey and UK Habitat (UKHab) Classification Condition Survey	Determination of habitat types and condition following principals of National Vegetation Classification (NVC) and determination of habitat condition applying	July 2022	Detailed within habitat Section below. Results to be incorporated into a revised PEA report and will

Survey	Methodology	Timing	Outcomes
	UKHab criteria (based upon guidance from Natural England) and to also determine the status of Local Wildlife Site (LWS) indicator species against the criteria used to select the LWS.		support the proposed Ecological Impact Assessment (EcIA).
Terrestrial Invertebrate Appraisal	Walkover appraisal of habitat by specialist invertebrate ecologist including sample collation and initial analysis. aim to provide a reasonable appraisal of the Sites' invertebrate assemblage and assessment of its potential importance for this species group.	July 2022	Results proposed to be incorporated into updated PEA report which will accompany planning application. Summary provided below.

The surveys conducted are considered to be valid and robust for the purposes of informing an Ecological Impact Assessment (EcIA) and Habitat Regulations Assessment (HRA). No additional ecology surveys within the Site are proposed to be conducted.

## Baseline Ecological Conditions

The PEA report provides the full results of the ecological desk study and initial habitat survey conducted at the Site. This report has been appended to this EIA Screening request for information. The following is a summary of the baseline conditions, including the surveys subsequently conducted which are yet to be written up formally.

## Statutory Designations

As detailed in Section 2 of the PEA Report, the Site is located adjacent to the Humber Estuary Special Area of Conservation (SAC), Special Protection Area (SPA) and Site of Special Scientific Interest (SSSI), and the Greater Wash SPA with marine components. At its closest point, the boundaries of the Humber Estuary SAC, SPA and SSSI align and are located approximately 10m from the north east boundary of the Proposed Development Site (comprising the sea wall). In combination the SPA, SAC and SSSI collectively are notified for a wide range of habitats and faunal interest features, in summary:

- estuaries, mudflats and sandflats not covered by seawater at low tide, sand dunes, coastal lagoons and sandbank habitats, all of which support a wide range of vegetation communities and faunal interests;
- fish, including sea lamprey (*Petromyzon marinus*) and river lamprey (*Lampetra fluviatilis*), and marine mammals, including grey seal (*Halichoerus grypus*);
- a wide range of breeding and non-breeding birds associated with open marine waters, intertidal habitats, reedbeds and coastal shores, and a waterbird assemblage numbering at least 153,394 birds; and,
- an invertebrate assemblage.

The Greater Wash SPA with marine components extends further offshore and over a wide area (3,536 km<sup>2</sup>) between the Norfolk and East Yorkshire coasts. It covers the breeding locations and foraging ranges of common tern (*Sterna hirundo*), little tern (*Sternula albifrons*) and Sandwich tern (*Thalasseus sandvicensis*), and the foraging and roosting habitats of little gull (*Hydrocoloeus minutus*), red-throated diver (*Gavia stellata*) and common scoter (*Melanitta nigra*).

No statutorily designated sites will be directly impacted by the Proposed Development.

Potential indirect effects of the construction and operational phases of the Proposed Development will be assessed within the EcIA. Furthermore, the potential effects will also be subject to a Habitat Regulations Assessment (HRA); comprising an initial (Stage 1) Test of Likely Significant Effects (or HRA Screening) on the designated features of the Humber Estuary SPA/ SAC/ Ramsar and Greater Wash SPA. It is, possible depending on the effects such as construction noise and operational water requirement of proposals, that a conclusion of no likely significant effects could be drawn without the need to rely on mitigation, but our current view is that this is unlikely. We therefore expect the need to proceed to the Stage 2 of the HRA process, known as Appropriate Assessment. The HRA Stage 1 (and potentially Stage 2) will be required regardless of the Proposed Development being confirmed as subject to the EIA Regulations as this is driven by separate legislation.

## Non-statutory Designations - Local Wildlife Sites

Although the land within which the Site is located has been allocated for future development within the Local Plan, the majority of the Site itself is designated as the ABP Wasteland Local Wildlife Site (LWS) and identified by the

Greater Lincolnshire Nature Partnership and NELC; a full description and map showing its extent is included in the PEA Report as has been previously issued to NELC.

The LWS is notified for a number of “main habitats” (brownfield mosaic; coarse or rank grassland; neutral grassland – semi-improved; and scrub – scattered/dense) with “additional habitats” (ruderal; coarse or rank grassland; and scrub – scattered). The citation for the LWS describes the habitats present as varied and species-rich and the Site passes the LWS qualification criteria BM1 (brownfield mosaic habitat) and CG1 (calcareous grassland habitat). Almost the entire area of the Site supports the Priority Habitat<sup>1</sup> “open mosaic habitats on previously developed land”.

The EclA will assess the impact of the loss of the majority of the ABP Wasteland LWS due to the Proposed Development and mitigation will be sought through additional consultation with LPA. Based upon the extent and layout of the Proposed Development, off-Site habitat compensation will likely be required to address the impact as there are limited opportunities for retention / enhancement within the Site boundary. The mechanism by which this is secured is subject to further assessment and consultation to be agreed prior to the EclA being finalised.

Several other LWS are present within a 2km radius of the Site, although none will be directly affected by the Proposed Development. Potential indirect effects on any other non-statutory designated sites are highly unlikely given the limited potential pathways for sources of impact, but this will be fully assessed within the EclA.

## Habitats

A detailed botanical survey was conducted in July 2022 to determine the habitat types present at the Site and the condition of those habitats. The full results of the detailed botanical survey conducted subsequently to the Extended Phase 1 habitat survey will be described in an updated PEA Report to support the planning application. In summary, the survey confirmed that the Site conditions encountered accord well with the LWS citation description provided by the LPA, including the information presented on ground disturbance for coastal protection works, evidence of which is still apparent.

However, it was also apparent from the findings of the survey that there is a discrepancy between the habitats listed as occurring on Site (in the LWS citation), and the reasons given for designation. The Site is stated to be designated for calcareous grassland, but based on plant species and vegetation community present, there is no evidence of calcareous grassland and instead the Site was only found to support neutral grassland. The grassland is a good fit for NVC MG1 grassland. However, the presence of calcareous grassland indicator species does not in itself indicate the presence of calcareous grassland, as such species are common on brownfield sites and in coastal habitats. Furthermore, many of the species present are also indicative of neutral grassland.

The survey concluded that the Site lacks sufficient floral diversity to be designated as an LWS for neutral grassland. The citation also supports this conclusion given it was not designated for this grassland type.

The LWS is also designated for brownfield mosaic habitat based on the local (not national definition), although it is not clear from the citation how this has been defined (i.e. applied to the whole site or just the disturbed ground). The brownfield mosaic should not be taken to encompass the areas of mature grassland, which are too large and cohesive to be considered part of this mosaic. Therefore, the only vegetation aligning with the definition is the ruderal / ephemeral vegetation arising after the ground disturbance associated with the 2013-14 coastal protection works (the citation indicates this area was grassland at the time of first designation). Based on the local habitat definition, this ruderal area does not meet the definition of brownfield mosaic under all of the LWS designation criteria.

Other habitat types occasionally present within the Site are all of limited ecological value and do not represent Priority Habitats. *Cotoneaster* sp. (*Cotoneaster simonsii* and potentially *Cotoneaster horizontalis*) listed on Schedule 9 of the Wildlife and Countryside Act 1981 were recorded within the Site.

## Protected / Notable Species

The Site provides limited potential to support protected and notable species and detailed in the PEA Report. Surveys have been completed for wintering birds, breeding birds and an appraisal of the Site for notable species of terrestrial invertebrate was completed. This is provided as a summary for information. Formal baseline reports will be prepared to accompany and inform the EclA.

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<sup>1</sup> Priority habitats are those identified as being the most threatened and requiring conservation action in the England. They are protected at national level under the provisions of the Natural Environment and Rural Communities (NERC) Act 2006, being listed on Section 41 of the Act.

## Wintering (Non-breeding) Surveys

The surveys sought to determine the use of the Site by non-breeding birds, in particular qualifying species of the SPA and SSSI designations. Over the course of the survey period between October 2021 and March 2022, inclusive, no coastal (SPA or SSSI) birds were recorded within the Site, with the exception of a single black-headed gull (*Croicocephalus ridibundus*) perching on one of the light gantry posts on a single occasion. As such, based upon the survey results, it is therefore considered that the Site has is not 'functionally linked' to any European site including the Humber Estuary SPA (or to the nationally designated SSSI) and is of limited importance to qualifying species.

The surveys also covered the intertidal habitats located on the foreshore immediately adjacent to the Site, alongside the Humber Estuary sea wall and mudflats, and for a distance north and south of the Site along the coast. Surveys were carried out across both the low and high water periods and recorded a variety of species for which the Humber Estuary SPA / SSSI is designated, but none in particularly large numbers. A number of gull roosts (mixed species) were observed, and these birds were generally tolerant of beach users. Small numbers of gulls and waders were also observed roosting on the stepped seaward face of the base of the sea wall adjacent to the Site, although roosting usage was infrequent. A detailed analysis of the wintering bird data will be undertaken as part of the HRA.

## Breeding Birds

The surveys identified a breeding bird assemblage within the Site consisting of relatively widespread and common passerine species, including both ground-nesting and scrub / tree nesting species. Thirty-three species were recorded, of which at least ten were not breeding (i.e. flying over the site, or visiting the site to feed only). Of these, two species (herring gull *Larus argentatus* and lesser black-backed gull *Larus fuscus*) bred colonially on the roofs of the adjacent cold storage and Grimsby Seafood Village buildings, as did carrion crow (*Corvus corone*). There were no wetland / coastal birds breeding within the Site (and therefore no qualifying / notified species of the Humber Estuary SPA and SSSI) breeding within the Site or using the Site in any other way (such as for feeding).

The breeding assemblage for the Site is likely to be of no more than local value as it is relatively limited and includes no more than nine Priority Species. This will be fully detailed in the EclA once the breeding status and numbers of each species have been quantified by formal territory analysis.

## Terrestrial Invertebrate Appraisal

In early July 2022 the Site was assessed for the potential of the land as a habitat for terrestrial invertebrates of conservation concern. Key habitat elements which are generally recognised as being of key importance to terrestrial invertebrates across the local and wider geographical landscape were investigated. Spot and sweep netting samples were also collected in line with the protocols outlined in NERR005 (Drake *et al*, 2007<sup>2</sup>). In summary, whilst a total of 57 species of invertebrates were recorded during the Site visits, no species of conservation importance were identified.

Habitat features of potential value to invertebrate species assemblages were not assessed to be of the high value to invertebrates as they were not distinct or varied enough to support an assemblage beyond those commonly associated with common grassland and scrub habitats. The Site lacked evidence of rotational management and had no visible freshwater sources and is geographically isolated.

The appraisal indicates that the Site would be of no more than local importance to terrestrial invertebrates which will be assessed within the EclA and supported by the appraisal within an updated accompanying PEA Report. Additional detailed surveys for this species group are not considered to be warranted.

## Other Species

There is no indication, from targeted field survey or third-party data, that the Site is of potential value / interest to European Protected Species, including otter (*Lutra lutra*) or great crested newt (*Triturus cristatus*). The trees have limited potential to support roosting bats, particularly given the relatively exposed coastal location of the Site. The habitats were appraised to be of limited suitability for foraging bats, and as such no specific bat activity surveys were considered necessary. No loss of mature trees is predicted. However, where any trees may require removal additional surveys for roosting bats will be undertaken to support the EclA.

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<sup>2</sup> Drake, C.M., Lott, D.A., Alexander, K.N.A. & Webb, J.R (2007) *Surveying terrestrial and freshwater invertebrates for conservation evaluation*. Natural England. Research Report NERR005. Natural England, Sheffield.



## Main Potential Effects

The key potential effects to the Proposed Development can be summarised as:

- potential indirect effects upon qualifying / notified species and habitats of the Humber Estuary SPA / SAC / Ramsar and SSSI designations during construction and operation (e.g. noise / visual disturbance, lighting disturbance); and,
- permanent loss of ABP Wasteland LWS habitat.

The client is committed to ensuring the delivery of 'no net loss' of biodiversity. A detailed mitigation strategy could be prepared in consultation with the LPA to ensure this commitment is met in accordance with national and local policies. The route of delivery for compensation of the permanent loss of the LWS habitat will be the main issue to be addressed.

## Proposed Documentation / Consultation

The following are proposed to be submitted to support the planning application:

- Habitat Regulations Assessment Screening Report and Appropriate Assessment (if the latter is needed, though (as stated above), we consider this to be likely). These will be informed and supported by desk study data and the ornithological report;
- Ecological Impact Assessment Report compliant to CIEEM guidelines for *Ecological Impact Assessment in the UK and Ireland* (CIEEM, 2018 updated April 2022<sup>3</sup>) (regardless of the outcome of the EIA screening EclA principles will be applied); appended by an updated PEA Report to include updated surveys results (i.e. robust baseline survey reporting to include and ornithology report (containing the combined results and analysis of wintering and breeding bird surveys).

Prepared by:	Reviewed by:	Verified by:
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<sup>3</sup> CIEEM (2018 updated April 2022) *Guidelines for Ecological Impact Assessment in the UK and Ireland*. Available at <https://cieem.net/resource/guidelines-for-ecological-impact-assessment-ecia/>

**APPENDIX 5: SCHEDULE OF APPLICATION DOCUMENTS**

REF	NAME OF DOCUMENT	AUTHOR
1.	Schedule of Application Material	Montagu Evans
2.	Application Covering Letter	Montagu Evans
3.	Application Form	Montagu Evans
4.	Site Location Plan	UMC
5.	Schedule of Application Drawings	Montagu Evans
6.	Application Drawings (inc. Block Plan, Proposed Floor Plans, Roof Plans, Elevations and Sections)	UMC
7.	Design and Access Statement	UMC
8.	Planning Statement	Montagu Evans
9.	Noise Assessment	S&D Garritt
10.	Flood Risk Assessment	Alan Wood & Partners
11.	Drainage Strategy	Alan Wood & Partners
12.	Energy and Sustainability Statement	Loren Networks
13.	Tree Survey / Arboricultural Assessment	TBC
14.	Transport Statement	TBC
15.	Framework Travel Plan	TBC
16.	Landscaping Strategy / Management Plan	TBC
17.	Phase 1 & Phase II Geoenvironmental Site Assessment	e3P
18.	Heritage Statement	AECOM
19.	Air Quality Improvement Plan	TBC
20.	Light Spillage Plan	TBC
21.	Relevant Ecology Surveys	AECOM
22.	Habitats Regulation Assessment	AECOM
23.	Archaeological Assessment	AECOM
24.	Plant / Extraction / Ventilation Details	TBC

REF	NAME OF DOCUMENT	AUTHOR
25.	Statement of Community Involvement	Montagu Evans