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BY EMAIL ONLY

20 March 2018

Dear Dr. Harrison,

Re: Application by Port of Tilbury London Limited (PoTLL) for an Order granting Development Consent for a proposed port terminal at the Former Tilbury Power Station ('Tilbury2') – Response to Examining Authorities First Written Questions.

Following the Planning Inspectorate's Rule 8 letter, dated 26 February 2018, Kent County Council (KCC) submits its response to the First Written Questions.

This letter provides responses to the First Written Questions where KCC has been requested to provide a response. This letter should be read in conjunction with KCC's Written Representation, where a general update on the principal submissions outlined in its Relevant Representation is provided.

Consideration of Alternatives

FWQ 1.4.1.

In ES paragraph 6.36, the Applicant explains that the CMAT facility is "more easily located away from the jetty itself as the process of moving aggregate from self-discharging vessels by conveyor is not distance sensitive."

[KCC required to answer part d and e only]

- a) In view of this, why is there not any consideration of alternative locations for the CMAT within other areas of the port or on nearby industrial land?
- b) Would all of the aggregates arriving at the Tilbury2 facility be within self-discharging ships?

c) What is the maximum distance that self-discharged aggregate (from dredgers or ships) could be moved by conveyor to reach an aggregate processing plant, or stockpile locations?

d) Is it essential to co-locate asphalt plants, concrete plants and concrete block making facility close to the source of aggregates?

e) Please could the host and neighbouring LPAs provide examples of aggregate wharves (and/or railheads) which are co-located within their area, which host the types of secondary aggregate processing facilities that are proposed in the CMAT, as well as any examples of the types of aggregate processing facilities that are proposed in the CMAT which are not co-located with any wharf and/or railhead (or any other direct source of primary or recycled aggregate), such as on industrial estates?

KCC response

d) Co-location of primary resource importation (aggregates) and manufacturing of secondary materials such as coated stone (asphalt and concrete block making) products is desirable as environmental impacts that would normally accrue from these activities can be concentrated rather than dispersed which assists mitigation (noise, dust, light etc.). Moreover, co-location generally means all activities take place within the overall boundary of the site with a degree of dispersion of the above activities for purely practical purposes. Economic factors such as minimisation of transportation would also mitigate against significant dispersion between importation and manufacturing processes.

e) Examples of aggregate importation sites with co-located manufacturing facilities (concrete manufacturing and asphalt manufacturing) within Kent:

- Allington Rail Depot, Maidstone
- Hothfield Works, Ashford
- Ridham Dock, Sittingbourne
- Johnsons Wharf, Dartford
- Robins Wharf, Northfleet
- East Quay, Whitstable
- Ramsgate Port
- Northfleet Wharf
- Old Sun Wharf, Gravesend
- J.Clubbs Marine Terminal, Gravesend
- J.Clubbs East Peckham Quarry

Examples of sites with aggregate processing facilities that are not rail depots or wharves within Kent:

- Hermitage Quarry, Maidstone (Gallagher)
- Stone Castle Farm, Whetsted (Lafarge)
- Lydd Quarry, Lydd (Brett Aggregates)
- Igtham Sandpit (H&H Celcon)

- Greatness Farm, Sevenoaks (Tarmac)
- Mock Lane, Chilmington (Brett Aggregates)
- Milton Quarry, Canterbury (Brett Aggregates)
- Bulwark Street, Dover (Brett Aggregates)
- St Michael's Close, Maidstone (Brett Aggregates)
- North Farm Lane, Tunbridge Wells (Brett Aggregates)
- Margate Concrete Plant, Manston Road (Cemex)
- Sittingbourne Concrete Plant, Crown Quay Lane (Cemex)
- Blue Bell Concrete Plant, Lower Bell Industrial Estate (Cemex)
- Snodland Quarry, Hays Road (Tarmac)
- Darenth Quarry (J. Clubb)
- 254 Broad Oak Road, Canterbury (Hanson)
- Fairwood Industrial Estate, Ashford (Hanson)
- Ridham Dock Road, Sittingbourne (Hanson)
- Clifton Road, Tunbridge Wells (Hanson)
- Pilgrims Way, Sevenoaks (Hanson)
- Carlton Business Park, Ashford (Gallagher)
- 33 St Gregory's Crescent, Gravesend (Roman Concrete)

Contaminated Land and Waste

FWQ 1.6.3

Are the host and neighbouring waste planning authorities satisfied with the level of detail contained within the Site Waste Management Plan? If not, why not?

KCC response

KCC is satisfied with the level of detail contained within the Site Waste Management Plan.

FWQ 1.6.7

Do you agree with the Applicant's statement given in ES paragraph 19.12? If not, why not?

KCC response

KCC agrees that the facility will significantly increase the regional capacity for aggregate supply and associated materials production. This will be to the benefit of the neighbouring minerals and waste planning authorities in terms of ensuring that regional self-sufficiency is enhanced.

Planning Policy

FWQ 1.14.4

Please can the host and neighbouring councils confirm whether they prepare and publish Annual Aggregate Assessments, and if so, how long have these been prepared for and please provide either the web-links to the documents, or provide the documents as PDFs to the Examination?

KCC response

Yes: Kent County Council produces Local Aggregate Assessments (LAA) annually. These are available to view at: <http://www.kent.gov.uk/about-the-council/strategies-and-policies/environment-waste-and-planning-policies/planning-policies/minerals-and-waste-local-plan/annual-monitoring-reports>.

FWQ 1.14.7

Do you participate in the South East England RAWP? If so, please could you provide any relevant RAWP documents that provide information on volumes of marine dredged aggregates, crushed rock and recycled/secondary aggregates that are landed at Kent wharves together with any RAWP documents that may indicate a need for a new or replacement aggregate wharf on the Thames?

KCC response

Kent County Council participates in the South-East England Aggregate Working Party (SEEAWP). The relevant information can be found in the Local Aggregate Assessment (LAA) 2016 (using 2015 data). The LAA 2017 (using 2016 data) is to be considered by the SEEAWP in April 2018.

The published LAAs are available at the following link: <http://www.kent.gov.uk/about-the-council/strategies-and-policies/environment-waste-and-planning-policies/planning-policies/minerals-and-waste-local-plan/annual-monitoring-reports>.

The Kent LAAs regard existing wharf capacity as important for aggregate supply (and is safeguarded by Policies of the adopted KMWLP) as land-won sand and gravels appear to be depleting. However, specific consideration of new wharves or extension to existing wharves to increase capacity has not been specifically examined by any Kent LAA documents or any documents produced by SEEAWP. KCC and Medway Council produced a wharf study in 2010 that looked at the capacities of existing sites at that time. This did not examine opportunities for significant new capacity in the Lower Thames. This can be found at <http://consult.kent.gov.uk/portal/mwcs/mwlp-eip/eip-library/> - document reference KCC/MWLP/CS/026.

Traffic and Transportation

FWQ1.18.7

KCC states [RR-021] that it supports modal shift from road to sea and rail, notes that the application proposes 2 or 3 train movements per day, and asserts that the application must ensure capacity of available train paths through London:

- a) Would the Applicant state how it is proposing to ensure capacity of available train paths through London, whilst not adversely affect passenger rail services?
- b) In response to KCC's call for consideration of lorry parking to be provided as part of the Proposed Development, due to the significant HGV movements associated with the application, what is the Applicant's position on this matter?

KCC response

KCC has no further detail to provide and awaits the applicant's response to this question.

KCC looks forward to working with the applicant and Planning Inspectorate as the project progresses through the Examination process. We will welcome the opportunity to comment on matters of detail further as may be required throughout the Examination.

Should you require any additional information or clarification, please do not hesitate to contact me.

Yours sincerely,



Katie Stewart

Director - Environment, Planning and Enforcement