



The Planning Inspectorate
The Square Temple Quay
Bristol
Avon
BS1 6PN

Our ref: AE/2018/122650/01-L01
Your ref: *
Date: 20 March 2018

Dear Sir/Madam

APPLICATION BY PORT OF TILBURY LONDON LIMITED FOR AN ORDER GRANTING DEVELOPMENT CONSENT FOR A PROPOSED PORT TERMINAL AT THE FORMER TILBURY POWER STATION (TILBURY 2) – SUMMARY OF WRITTEN REPRESENTATIONS. FORT ROAD, TILBURY, ESSEX, RM18 7NR

Environment Agency – Summary of written representations

This letter provides a summary of the written representations submitted on 20 March 2018 as part of the Development Consent Order for the proposed port known as Tilbury 2.

Our written response outlines our role and provides information in regards to Hydrogeology, flood risk, ecology, water framework directive, environmental permitting and drainage. All sections include updates of ongoing work with the applicants in regards to each area.

Hydrogeology and ground conditions

We highlight the potential for contamination across the development site, given it's previous uses. We acknowledge that we have undertaken recent dialogue with the applicant in regards to their approach to remediation at the site. Our response also sets out the work the applicant would be required to undertake to prevent pollution of groundwater.

Flood Risk

Our flood risk response commences by outlining the TE2100 plan and flood risk across the estuary, in particular we provide an update on the memorandum of understanding being produced between the Port of Tilbury, London (POTL) and ourselves. We provide information in relation to flood risk modelling and detail the

work the applicant needs to complete to demonstrate the flood risk both on and off the site. We also provide details in regards to culvert modelling in the infrastructure corridor. We highlight that the applicant will need to consider climate change within their modelling.

We provide details of the fluvial flood risk at the site and concentrate on the proposed culverts for the Chadwell Cross and East Tilbury Dock sewers and how these could impact on flood risk within the representations.

We also provide details in regards to the flood management plan in our response. Whilst we highlight work the applicant is required to complete in regards to modelling to inform an addendum Flood Risk Assessment, we acknowledge we have recently received this document and are in the process of reviewing that document and providing updated information.

Flood Defences

Our response acknowledges that the applicant wishes to build a link bridge over the existing flood defences. We highlight the pre-application work undertaken with the applicant and outline what the applicant will need to consider in regards to future defence raising. We indicate that we are yet to see detailed plans for the proposed bridge.

Ecology

We detail the risk posed by the development to ecology at the site. Our response shows that we have some concerns in regards to ecology, in particular the lack of detail in regards to mitigation plans for open mosaic and saltmarsh habitats. We retain further concerns we have in regards to the impact of the development on eels. We conclude by acknowledging we are continuing dialogue with the applicant in regards to ecological issues.

Water Frame Directive

Our comments in regard to water framework directive issues concentrate on the potential for deterioration of water quality caused by in-combination effects with the proposed power station at Tilbury. In particular we raise the risk to water quality posed by future dredging of the port. We explain that we are satisfied by the water framework directive assessment for terrestrial habitats.

Environmental Permitting

We provide information which the developer will need to consider prior to the commencement of their development in regards to the environmental permit which covers the Tilbury power station site where the port is to be developed.

Drainage Strategy

We have provided information in regards to the drainage strategy at Tilbury 2 which we broadly agree with.

Environmental Permitting (2)

We provide further information in regards to environmental permitting for flood risk activities and acknowledge that the applicant wishes to dis-apply the need for a permit which could be agreed under our protective provisions within the DCO.

Protective Provisions

We conclude our comments by confirming we are considering the applicants request to dis-apply various parts of legislation via the DCO process.



Mr. Pat Abbott

Planning Advisor

Direct dial 0208 4748011

Direct e-mail pat.abbott@environment-agency.gov.uk