

**Gravesham Borough Council's response to the Panel's First Written Questions (FWQs) (20/03/2018)**

1.1.1.	Applicant/ Gravesham Borough Council	<p><b>GBC states [RR-019] that it is not convinced that Tilbury2 is fulfilling its potential as a strategically important infrastructure project:</b></p> <p><b>a) Would GBC provide more detail on what it means by this statement?</b>  <b>b) Would the Applicant state its position on GBC's statement?</b></p>
<p>Both Thurrock and GBC in our Relevant Representations highlighted that we felt further work was needed on the ability to provide shore power to vessels as technology improves so vessel engines can be turned down in port, reducing air quality and noise emissions. GBC stated that, at present, we were not convinced that the Tilbury2 is fulfilling its potential as a strategically important infrastructure project in this regard.</p> <p>In the PoTLL's response to the relevant representations makes reference to their response in Table 18.7 of the ES. Their response is that:</p> <ol style="list-style-type: none"> <li>1) existing technology on ships is not currently suitable for shore power to be utilised at Tilbury2, and</li> <li>2) at present, electrical capacity is extremely limited due to the National Grid infrastructure locally and capacity upgrades would be very costly</li> </ol> <p>The PoTLL advises that there is a commitment to provide the infrastructure to ensure that shore power can be accommodated at the Tilbury2 site in the future should the vessel profile change in the Operational Management Plan (Document Reference 6.10). In Section 6.3 of the OMP, it is stated that future improvements including the ability to provide shore power to vessels will be considered as and when the vessel fleet and local infrastructure can support such improvements.</p> <p>A quick google search indicates that a number of non-UK ports (including in Canada, USA and India), offer shore power. They list the benefits and sometimes offer incentives – for example <a href="https://www.portvancouver.com/wp-content/uploads/2016/06/2016-05-18-Shore-Power-Container-Qs-and-As-for-website.pdf">https://www.portvancouver.com/wp-content/uploads/2016/06/2016-05-18-Shore-Power-Container-Qs-and-As-for-website.pdf</a></p> <p>Gravesham BC also understands that the EU Directive 2014/94/EU on the Deployment of Alternative Fuel Infrastructure requires EU ports to progressively equip berths to be shore power-ready by 2025. The purpose of the Directive is to minimise dependence on oil and to mitigate the environmental impact of transport. To facilitate this, a statutory instrument entitled "The Alternative Fuels Infrastructure Regulations 2017" <a href="http://www.legislation.gov.uk/ukxi/2017/897/made">http://www.legislation.gov.uk/ukxi/2017/897/made</a> came into force on 9 October 2017.</p> <p>As set out in the accompanying explanatory note, Regulation 4 requires that, after 17th November 2017, a statutory harbour authority deploying or renewing a shore-side electricity supply installation for seagoing ships, must ensure that it complies with a technical standard for the design, installation and testing of such installations as specified in the Schedule. We understand that since 2012, an international</p>		

standard on shore power, (ISO/IEC/IEEC 80005-1), has been in place to ensure worldwide compatibility between ports and vessels.

A press article from March 2017, advises that Southampton City Council wants the city's port to be the first in the country to implement shore power to tackle the pollution of ships running their engines while docked. Southampton is one of five cities, plus London, required to implement a Clean Air Zone by 2020. The article includes that "Port director Alastair Welch from Associated British Ports told the BBC he would like to see shore power in place as soon as possible".

It is GBC's view that this is a golden opportunity to embed shore power from the outset at Tilbury2 instead of the ship operators controlling whether they equip their ships or not. Having ships docked in the river with their engines running to power the ship will cause unnecessary air pollution and noise pollution. GBC wants the Panel to consider whether there should be some commitment to install a facility in a given period of time.

1.13.3	<b>Applicant/Gravesham Borough Council (GBC)</b>	<b>GBC asserts [RR-019] that the operation of the Proposed Development is likely to have a potential impact upon the settings of the Scheduled Monuments of New Tavern Fort and Gravesend Blockhouse, and the non-designated but nationally important Shornemead Fort:</b>  <b>a) Would the Applicant state its position on this matter?</b> <b>b) Would GBC state what in its view should be done to mitigate any impact that the Proposed Development will have on these monuments, including lighting and views from Gravesham?</b> <b>c) Does GBC consider the assessment of lighting from the Proposed Development on views to be satisfactory?</b>
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GBC is of the opinion that the operation of the proposed development will have a potential adverse impact on a range of designated and undesignated heritage assets on the southern shore of the Thames as it lies within their setting and will represent a major intensification of development and activity directly opposite and downriver of Gravesend's historic town centre and the Riverside Leisure Area.

Whilst Gravesend is an important riverside town and port activity contributes to its character, the expansion of the port into Tilbury2 will detract from the relationship between Tilbury Fort, New Tavern Fort and the Gravesend Blockhouse in particular as closely inter-related defence heritage assets.

It is noted that the applicant's Built Heritage Assessment (ES Appendix 12B) concurs that there will be an adverse impact on the significance of these assets and also on others on the river frontage. Whilst this impact is likely to be minor adverse and result in less than substantial harm, GBC would argue that any degree of harm is made worse by its cumulative nature whereby it impacts simultaneously on multiple assets and not on each one individually as set out in the applicant's Built Heritage Assessment.

Also, the applicant has declined to take into account the combined impact of the Tilbury2 development with RWE's proposals for a new power station adjoining, leaving the latter's own NSIP application to deal with the matter.

Whilst, GBC would not expect Tilbury2 to mitigate the impact of the RWE proposal, it is necessary to understand what the combined impact in terms of intensifying development and activity immediately east of Tilbury Fort is likely to be. RWE has recently undertaken a public consultation on their proposals and the concept is therefore understood in general terms.

Irrespective of this, the fact that development of this type of scale is highly likely to take place on a site immediately adjoining should have been taken into consideration as the two will need to sit comfortably together whilst avoiding (as far as practicable) harm to the significance of identified heritage assets. In this context, the acceptability or otherwise of the proposed silo and the degree to which both sites will be lit are likely to be important material considerations.

No comments are made here on the harm to significance of heritage assets on the northern shore, this being a matter for Historic England and Thurrock Council. However, this does not mean that harm (for example) to Tilbury Fort through development within its setting does not have implications for Gravesham, given that it is part of the context within which assets in Gravesham are appreciated and understood.

Turning specifically to the questions asked by the Panel of GBC, our responses are:

**b) Would GBC state what in its view should be done to mitigate any impact that the Proposed Development will have on these monuments, including lighting and views from Gravesham?**

In terms of impact on heritage assets, it is not changes to views across the river from Gravesend per se that is the issue rather how the proposal has the potential to affect the significance of those heritage assets as development within its setting. This will differ between day and night time, particularly as there will be an operational need for the site and ships on the jetty to be lit. The position and movement of ships will also itself have an impact.

As noted above, the primary harm to heritage assets on the southern shore would arise due to the intensification of port and other development immediately to the east of Tilbury Fort. This would adversely affect the setting of Tilbury Fort and the way in which its interrelationship with defence heritage assets on the southern shore are appreciated and understood. This interrelationship goes back to the 1540s when both Gravesend Blockhouse and Tilbury Fort became operational. Whilst this relationship has evolved over time, as the defences were upgraded, the basic concept of a 'cross fire' zone to prevent attack by enemy ships remained key – extending also down to Coalhouse, Cliffe and Shornemead forts over time.

It is therefore how the defence complex and the role of Gravesend as the river gateway to London over hundreds of years which is key to mitigating the adverse impact of the development and this could be achieved in part through the upgrading of interpretive materials/facilities both on site but also via web and audio-visual resources such as phone apps etc.. Historic England's London Walks

webpage provides examples of what has been achieved elsewhere in respect of the latter <https://historicengland.org.uk/get-involved/protect/keep-it-london/walk-history-london/>

Whilst it has not discussed the scope of such a project with Historic England/Thurrock Council to date, there is clear potential to do something similar for the northern shore as an integrated package. Not only would this improve understanding of the heritage assets themselves and their interrelationship but also provide a unique opportunity to exploit their potential as an educational, cultural, and recreational resource alongside the creation of the National Coastal Path. An added benefit of such a project could be that it also includes material to better reveal the significance of the historic development of Tilbury itself as a major port and undesignated heritage asset in its own right.

GBC would therefore wish to see Tilbury2 make a proportionate contribution toward such a project that could be used as matched funding for an HLF bid with a wider remit to include renovation works that are currently required but not necessarily linked to the mitigation of the impact of the port expansion and is prepared to enter into negotiations on that basis.

**c) Does GBC consider the assessment of lighting from the Proposed Development on views to be satisfactory?**

GBC's response to this question is based on the applicant's ES Appendix 9J Preliminary Lighting Strategy and Assessment, which includes views of Tilbury 2 from both the Gravesend riverside and Windmill Hill – the latter being an important strategic vantage point immediately south of Gravesend town centre. These both show that the existing site is largely dark, as it has been previously cleared. The demolition of the existing Tilbury Power Station will also add further to an area of perceived darkness on the northern shore. This forms the baseline against which this and adjoining proposals stand to be assessed.

Table 10 to the document includes an assessment of lighting impact. The applicant accepts that there will be an adverse impact when the site is viewed from the southern shore but contends that this is within acceptable limits. GBC would make the following comments in relation to the applicant's assessment:

- It is difficult to assess what the actual as opposed to predicted impact will be and the erection of temporary lighting on site to assist the Panel during an evening site visit may be useful. In any event, GBC would expect any DCO to contain provisions as to what measures will be undertaken in the event of light nuisance being caused and the steps the applicant will take to remedy such nuisance.
- It is unclear as to whether a detailed assessment has been made of the impact of the proposal (including any ships likely to be moored on the jetty, which will presumably also be lit) on the Gravesend Canal Basin key development site included as a strategic allocation under policy CS04 in the Gravesham Local Plan Core Strategy (2014). Whilst outline planning permission for this site has time-expired, it remains a strategic allocation within the local plan and impact of lighting at the port should not prejudice its future delivery. Within the DCO, it should be made clear that any measures to mitigate light nuisance extend not only to existing

development but that proposed on the riverside at the Canal Basin.

- The assessment provided by the applicant primarily considers impact on sensitive receptors, such as residential areas overlooking or close to the site. However, the material does highlight the significant impact the development will have in re-introducing night time activities immediately adjacent to Tilbury Fort – including ships tied up on the jetty to the south of the Anglian Water site. This should be taken into account when considering impact on the significance of the identified heritage assets because at the moment night-time views would be closer to what would have been seen when the fort had its original marshland context. An adverse impact such as this will also affect the context within which heritage assets on the southern shore are appreciated and understood.
- The assessment compares the impact of the silo with CAA lighting with that of the former power station chimneys – which were also lit. However, these have been demolished and what is in the assessment does not represent a true ‘without development’ baseline. Also, whilst the proposals for the new power station are at an early stage, the consultation proposals show three new chimneys with a height of 95m. It is not known whether these would require CAA lighting. However, if they do, the result would be a cluster of 4 tall structures (including the silo) that would be lit at night and have a significant visual impact.
- The lighting impact assessment is presumably based on the proposed outline lighting scheme provided as part of the application. Would permitted development rights for ports in general or as set out in the draft DCO allow for a different or modified scheme of lighting that could result in different impacts? If so, because the application is subject to EIA based on Rochdale envelope principles, should such permitted development rights be reviewed to ensure the impact of any scheme remains within acceptable limits?

1.14.14.	<b>Thurrock Council, Gravesham Council</b>	<b>Does the application conflict with any proposals or policies in any development plan documents? If so, please provide a summary and a link to the relevant policy and/or proposals map?</b>
<p>The application site lies entirely within the area of Thurrock Council and stands to be determined in accordance with the National Policy Statement for Ports (NPSP, Jan 2012) or other material considerations as set out under s.104 of the 2008 Planning Act. Material considerations are therefore likely to include matters raised through submitted Local Impact Reports; the National Planning Policy Framework (2012); and development plan policy for the area concerned. There is currently no marine policy statement in place relating specifically to this part of the River Thames.</p> <p>However, in this instance, the proposal has the potential to impact on both existing and proposed development in Gravesham due to proximity. These impacts are likely to relate primarily to amenity (noise/disturbance/light pollution/visual amenity); air quality (both directly from the operation of the port facility and movement of shipping); and the historic environment (development within the setting of heritage assets in Gravesham, affecting their significance). The potential to impact on sites designated for their nature conservation value, and the natural environment in general, is also recognised.</p> <p>In general terms, national policy sets out how such matters should be evaluated. Because the Gravesham Local Plan Core Strategy (2014) follows national guidance and is consistent with it, it is considered that there is no specific reason to refer to local plan policy. The</p>		

panel will be aware from the ES accompanying the application what assets in Gravesham have the potential to be affected and other constraints that apply.

However, GBC's primary concern in local plan terms relates to the potential of the proposal to adversely impact upon and affect the delivery of the regeneration of the Gravesend Canal Basin area which lies directly opposite on the south side of the River Thames only some 930 metres from the jetty. Such impacts not only relate to the operation of the site itself but potentially how and when ships manoeuvre onto the jetty.

The Gravesend Canal Basin area is identified as a key development site and therefore a strategic allocation under policy CS04 of the Gravesham Local Plan Core Strategy (2014).

As such, the Panel's attention is drawn in particular to policy CS04 on the Gravesend Riverside East and North East Gravesend Opportunity Area at pages 51 – 59 of the Core Strategy, available on-line at [http://selfservice.gravesham.gov.uk:8081/webdocs/planning/Gravesham-Local-Plan-Core-Strategy-September-2014.pdf?\\_ga=2.171043360.1887040556.1520951575-1881602276.1472724650](http://selfservice.gravesham.gov.uk:8081/webdocs/planning/Gravesham-Local-Plan-Core-Strategy-September-2014.pdf?_ga=2.171043360.1887040556.1520951575-1881602276.1472724650)

The Canal Basin Key Site (2.1) is identified at figure 9 on page 51 and on the schematic plan at figure 10 on page 58. Attention is also drawn to Policy CS04 at 4.5.32 on page 56 which relates directly to the Canal Basin Key site.

How this relates to the overall spatial strategy for the Borough of Gravesham is set out in policy CS02 on the Scale and Distribution of Development at page 35 of the Core Strategy, as also explained in the supporting text at pages 26 – 35.

The overall extent of the Gravesend Riverside East and North East Gravesend Opportunity Area is shown at page 3 of the Gravesham Local Plan Policies Map (2014) at [http://selfservice.gravesham.gov.uk:8081/webdocs/planning/Gravesham-Local-Plan-Core-Strategy-Policies-Map-September-2014.pdf?\\_ga=2.103411200.1887040556.1520951575-1881602276.1472724650](http://selfservice.gravesham.gov.uk:8081/webdocs/planning/Gravesham-Local-Plan-Core-Strategy-Policies-Map-September-2014.pdf?_ga=2.103411200.1887040556.1520951575-1881602276.1472724650)

Whilst the last outline planning application for this key site is time expired, this provides some idea of what is likely to come forward in due course. The Panel's attention is therefore drawn to the design principles document submitted in support of GBC application reference 2011/0713 available on line at <http://docs.gravesham.gov.uk/AnitePublicDocs/00070598.pdf>

1.15.5.	<b>Applicant/ Thurrock Council (TC) and Gravesham Borough Council (GBC)</b>	<p><b>ES [APP-031] Chapter 9 paragraph 9.245 explains that lighting is designed to avoid or reduce potential lightspill. Effects are assessed as moderate adverse but are considered to be acceptable and would to some extent represent re-establishment of historic industrial and waterfront relating lighting along the Thames:</b></p> <p><b>a) Would the Applicant explain why these moderate adverse effects are considered to be</b></p>
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		<p><b>acceptable?</b>  <b>b) Would TC and GBC state whether they are content with this position, and if not, propose further mitigation measures?</b></p>
<p><b>GBC's response to question b) above:</b></p> <p>Whilst Gravesham supports the expansion of the Port of Tilbury in principle and accepts that lighting on this site and that adjoining (i.e. the former power station site) is capable of being designed so as not to cause a direct impact on residential properties (both existing and proposed) to the south of the river, it does not accept that this simply re-establishes historic industrial and waterfront lighting along the Thames.</p> <p>The application site formed part of the former Tilbury power station site whereby lighting levels were in general terms more subdued – GBC has been unable to find any evidence within the submission that clearly demonstrates that the lighting level was similar to that proposed or that it extended over such a wide area.</p> <p>A stock photo available on-line at <a href="http://www.alamy.com/stock-photo-tilbury-power-station-gravesend-kent-england-at-night-23853209.html">http://www.alamy.com/stock-photo-tilbury-power-station-gravesend-kent-england-at-night-23853209.html</a> shows Tilbury B power station viewed from Gravesend at night. Whilst the light associated with the London Gateway port to the east is evident, light spillage onto the river from Tilbury power station itself appears to have been primarily associated with the CAA lights on the chimneys, area lighting; lighting to the main structure and conveyors; and the jetty. It would appear that lighting to the actual current application site was negligible at this stage and that it didn't extend so far to the west – albeit that the Anglian Water site even further to west is not in shot.</p> <p>On this basis, it is difficult to see how the applicant's contention in terms of re-establishment can be sustained. The level of lighting and its intensity is likely to be greater given the need to have high columns and adequate lighting to areas to meet operational requirements. A comparison with the lighting at London Gateway may be useful in this respect given that it can clearly be seen at some distance to the east.</p> <p>The changes that are likely to occur in terms of ships moored on the jetty and the need for 24 hour lighting to allow 24/7 working is also likely to increase the level of lighting compared to the previous situation – irrespective of how well that lighting is designed to avoid spillage or intrusion.</p> <p>In any event, it is now arguable that the environmental baseline for the Tilbury 2 application is actually a largely cleared site where lighting is has been reduced and not what existed previously.</p> <p>However, this does not mean that the proposal itself is unacceptable in terms of lighting and potential impacts both in terms of amenity and</p>		

the setting of heritage assets and the points made by GBC in respect of question 1.13.3 apply. Attention in this respect is also drawn to the points made by GBC in relation to permitted development rights and the Rochdale envelope in the context of EIA development, along with what provisions might be included within a DCO to deal with the mitigation of unforeseen adverse impacts post commissioning of lighting.

1.16.6.	<b>Thurrock Council; Gravesham Council</b>	<b>Noise sensitive receptors (NSRs) are listed in Table 17.27 and illustrated on Figure 17.2 of the ES. This includes five receptors along the infrastructure corridor by the town of Tilbury, one at Tilbury Fort and two in Gravesend (across the River Thames). The same receptors have been used for the vibration assessments. Have the LPA's agreed the NSRs?</b>
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The PoTLL shared selected draft ES chapters with Gravesham BC before they were finalised and we provided comments on the draft noise and vibration document. The draft ES in paragraph 17.12 advised “Sensitive receptors have been selected across the study area to capture those which may be affected by the proposal”. Paragraph 17.15 then included that “The monitoring locations were discussed with the local authorities, with the locations in Thurrock agreed with the TC environmental health officer before the noise surveys were undertaken”.

GBC went back to PoTLL as we felt that this is misleading as GBC had not been asked for potential locations and was not consulted on the locations to be used for either the monitoring or the noise assessment. Notwithstanding this, GBC’s response to the PEIR highlighted that the future noise assessment should consider a location within the allocated Canal Basin Regeneration Area Key Site. GBC appreciates that NSR 8 was included to deliver that location.

If we had been asked, GBC would have highlighted the existing dwellings in the Canal Basin area, such as the Venture Court location that was used for LT4. Heritage Quay next to the Customs House, cottages at Mark Lane and the upper floors of Chantry Court would have been other suggestions.

1.16.12.	<b>Thurrock Council; Gravesham Council</b>	<p><b>Based on the calculations presented in Tables 17.38-39, the ES concludes:</b></p> <ul style="list-style-type: none"> <li>• <b>Major and significant effects from the CMAT at night time for receptors in Gravesend (NSR 7 &amp; 8) (para 17.174);</b></li> <li>• <b>Localised significant effects at NSR 2 from the RoRo from general storage areas (para 17.181 &amp; 17.221).</b></li> </ul> <p><b>Do the local authorities have concerns regarding the proposals, with regard to noise? Please detail any concerns.</b></p>
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Yes. GBC is concerned about 24 hour working and the significant effect from night time CMAT operations, as currently modelled, on current and future receptors in Gravesham. As explained in our response to 1.14.14. above, the potential of the proposal to adversely impact upon and affect the delivery of the regeneration of the Gravesend Canal Basin area which lies directly opposite on the south side of the River Thames only some 930 metres from the jetty is a concern.

GBC also recognises the relevant representations made by local residents raising their concerns about 24 hour operation which may be “unbearable”.

GBC concerns not only relate to the operation of the site itself but potentially how and when ships manoeuvre onto the jetty.

*(To reduce duplication we have provided more detail in our response to FWQ 1.16.20)*

<b>1.16.16.</b>	<b>Gravesham Council</b>	<b>With regard to vessel noise, additional confirmatory work has been undertaken by the Applicant, and a technical note detailing the findings prepared and shared with Gravesham Council. Please provide an update on your response to this matter.</b>
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In its response to the PEIR, GBC noted that no assessment has been made of noise that may be generated by loading/unloading of the ships or other port-side activities, although it is intended that measurements will be taken of existing operations at Tilbury to provide a baseline. GBC consider it important that any such measurements accurately reflect the type of operation likely to be taking place at Tilbury2 rather than just port noise in general.

Following a number of pre-submission meetings / emails and phonecalls with the PoTLL and their noise consultants, the PoTLL commissioned their consultants to undertake additional confirmatory work. In summary, they measured the operation and engines from a vessel with dead weight of 16073 – bigger than the boat they originally considered (11564) and heavier than both the Endeavour (9167) which they say they currently would use if they needed a larger vessel for CMAT and the Bore Sea used for Ro-Ro (13375).

The resultant technical note detailing the findings is appended to the PoTLL’s response to the relevant representations document “Appendix 3 Aggregate Ship Noise Assessment”. We confirm that the technical note was shared with GBC in early February 2018 and Environmental Health have advised that the document and its calculations appear robust and so it is apparent the heavier vessels will not have an impact on receptors in Gravesham. This position is related in our SoCG.

<b>1.16.20.</b>	<b>The Applicant, Gravesham Council.</b>	<b>Gravesham Council [RR-019] is concerned over 24 hour operation of the CMAT as the CMAT would operate 312 days a year 7am - 7pm Monday – Friday and 7am – 12pm Saturdays. Gravesham states that they are discussing this with the Applicant and the Application will provide a justification for 24/7 hour operation. Please provide an update on discussions.</b>
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The PoTLL shared selected draft ES chapters with Gravesham BC before they were finalised and we provided comments on the draft noise and vibration document. Paragraph 17.164 of the draft ES onwards considered the “Operational Phase - CMAT and RoRo Terminal: Airborne Noise” and no hours of operation were given but it was assumed from other text, that the CMAT could operate 24/7, 363 days per year (NB. In the submitted ES, paragraph 5.59 explains that, for the purposes of environmental assessment, it has been assumed that CMAT could operate 24/7, 363 days per year).

GBC flagged that to the PoTLL this is different to the operation of the CMAT proposed in the PEIR. The final PEIR issued on 13 June 2017 included:

5.44 The CMAT is envisaged to operate 312 days per year (six days per week), 7am - 7pm Monday – Friday and 7am – 12pm Saturdays.

8.79 During operation, the following measures are being considered as part of the scheme design, where operational parameters permit. ....

- **Restricting CMAT activities working hours;**

17.66 The following measures are being considered as part of the design process, subject to operational parameters:

- Placement of doors to limit noise breakout from the CMAT aggregates process buildings in the direction of the nearest NSR.
- **Restricting CMAT activities to daytime hours only.**

This change is significant because of paragraph 17.174 in the ES, as highlighted by the Panel (FWQ 1.16.12.), which says “During the night the Rating level is more than 10dB above background and total noise levels would increase by at least 3dB, indicating that night time CMAT activities would be major and significant at those locations in Gravesend.”

With the original hours suggested for the CMAT in the PEIR it appears that this impact would not occur and GBC has suggested to the PoTLL that those original hours should be taken forward.

In response, the PoTLL has advised that the CMAT needs to be 24 hour operation for it to be commercially attractive and so GBC requested that this is evidenced. As explained in the PoTLL’s response to the relevant representations, PoTLL is currently in discussions with GBC on PoTLL’s requirement to operate Tilbury on a ‘24/7’ basis. A note appended to the response to the relevant representations document “Appendix 2 The Need for 24/7 Working at Tilbury2” sets out the PoTLL additional explanation and justification for the required 24 hour operation.

GBC would appreciate the Panel’s consideration of whether it is reasonable to expect the PoTLL to have restricted hours of operation for the CMAT.

(NB. Please note that the submitted outline business case (Document ref:7.1) includes “Table 2: Tilbury2 business scope and key operational requirements” advises “CMAT terminal operations: The CMAT is envisaged to operate 312 days per year (six days per week), 7am - 7pm Monday – Friday and 7am – 12pm Saturdays. There is potential for truck loading activities to occur outside of these hours.” And so the case for the CMAT is not clear )



**Table 2: Tilbury2 business scope and key operational requirements**

	Business scope for Tilbury2	Key operational requirements
<b>Core (minimum) requirements</b>	<p><b>Ro-Ro terminal specifications:</b></p> <p>An approach bridge comprising a 3 lane roadway and adjoining footway</p> <p>A linkspan bridge connecting the bridge to the floating pontoon</p> <p>A floating pontoon</p> <p>Erection of a control office on the floating pontoon</p> <p>Footway Link bridge, linking the floating pontoon to the existing jetty</p> <p>Seven mooring dolphins arranged east west as an extension to the existing jetty connected by a footway link bridge</p> <p>Removal of the existing Anglian Water Authority (AWA) jetty.</p> <p><b>CMAT terminal specifications:</b></p> <p>Installation of an extension to the existing conveyor system;</p> <p>Erection of new feed hopper</p> <p>Installation of 6 number mooring dolphins to the front of and downstream of the existing jetty</p> <p><b>Berth pockets and approach dredging:</b></p> <p>Dredge pockets will be created and maintained for the life of the terminal around the improved terminal jetty. In relation to the downstream (aggregate) jetty, the depth of pocket will cater for the largest likely vessels to visit the site in the future (100,000 tonnes).</p> <p>The immediately adjoining approaches to the berth pockets will also need dredging and are included within the indicative DCO limits</p>	<p><b>Ro-Ro terminal operations:</b></p> <p>The Ro-Ro terminal is envisaged to operate 363 days per year, 24 hours per day<sup>13</sup></p> <p>The capacity of the terminal is considered to be a maximum 600,000 units (trailers or containers) per annum. The objective of the likely operator is a throughput of 360,000 units per annum.</p> <p>The Ro-Ro terminal will be completed by PoTLL on behalf of the customer, and will accommodate two vessel movements per day once the site is fully operational.</p> <p><b>CMAT terminal operations:</b></p> <p>The CMAT is envisaged to operate 312 days per year (six days per week), 7am - 7pm Monday – Friday and 7am – 12pm Saturdays. There is potential for truck loading activities to occur outside of these hours.</p> <p>The proposed capacity of the CMAT will be 1,600,000 tonnes per annum. It is expected that a total of 700,000 tonnes will be transported away from the site by rail, and 750,000 tonnes by road. Of that leaving the site by road, 50% will be exported on 16T vehicles and 50% on 33T vehicles. It is expected that some 1 – 3 trains per day will remove materials from the site.</p> <p>A total of circa 150,000 tonnes of material per annum is expected to leave the CMAT by barge.</p> <p><b>Highways and public rights of way:</b></p> <p>The scheme is likely to include diversion of public rights of way and modifications to the local highway network. The full extent of these works will be known following the transport assessment carried out for the Tilbury2 project as part of the EIA process.</p> <p>A public footpath (By-way 98 or FP 146) routes along the foreshore of the Thames at the southern boundary of the site. This footpath forms</p>

<sup>13</sup> Tilbury2 Preliminary Environmental Information Report, 2017.

1.18.4.	Applicant/ Gravesham Borough Council (GBC)/ Highways England (HE)	<p>With reference to GBC's concern [RR-019] to see a SoCG between the Applicant and HE agreed to ensure that the traffic impacts on Gravesham "generated by the Port of Tilbury by virtue of the Lower Thames Crossing once built, are comprehensively modelled and mitigated for and don't fall between these 2 NSIP projects":</p> <p><b>a) What are the Applicant's and HE's response to this concern of GBC?</b></p>
<p>In its response to the PEIR, GBC commented on the applicant's decision to exclude the Lower Thames Crossing from the list of projects that have been taken into account in assessing cumulative, in-combination effects.</p> <p>As a result of our concerns, Gravesham BC appreciates that the PoTLL has considered this again in paragraphs 2.57 – 2.63 of the ES and the PoTLL have concluded that it is not possible to properly define an LTC 'scheme' in order to assess the cumulative impacts with the proposals. Given this context it is not the intention to assess the cumulative impact of Tilbury2 with the LTC; nor is it considered reasonable to prepare an alternative Traffic Impact Assessment that considers the new highway network and traffic distribution that could result if the LTC were implemented. Clearly, the modelling for the LTC itself will need to deal with cumulative impacts, including, as appropriate, from Tilbury2.</p> <p>GBC has been clear in its message to the PoTLL that the Council does not have unreasonable expectations about how much Tilbury2 should cover in its assessments, rather we need to ensure that any impact that arise that affect Gravesham are mitigated.</p>		