

**From:** [Lesley Stenhouse, Principal Spatial Planner](#)  
**To:** [Tilbury2](#)  
**Cc:** [Matthew Jericho, Spatial Planning Manager](#)  
**Subject:** Tilbury 2 - FWQ Response by Essex County Council  
**Date:** 20 March 2018 20:49:39  
**Attachments:** [image001.png](#)  
[RE Tilbury2 - Relevant Reps - Highways .msg](#)  
[Apx1\\_FWQ\\_Ref 1.4.1\\_e\) ECC response to list of sites.docx](#)  
[Tilbury 2 ECC Schedule of responses to FWQ\\_2032018.docx](#)

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Dear sir/madam

## **RE: ECC's response to Tilbury 2 FWQ**

Please find enclosed ECC's response to the questions raised by the Examining Authority within the FWQ.

ECC's comments are set out in the following 3 attached documents:

1. Tilbury 2 ECC Schedule of responses to FWQ\_20032018  
Supported by the following two appendices:
2. Apx 1 FWQ Ref 1.4.1.e) list of transshipment sites and secondary processing plants in Essex County Council
3. Apx2 Tilbury 2 FWQ\_ ECC\_POTLL Transport clarification email 16 March 2018

ECC and POTLL are seeking to separately update the SoCG003, to reflect ECC's comments and clarification within the FWQ.

Please contact me if you require any additional information.

Lesley

### **Lesley Stenhouse**

Principal Spatial Planner  
Planning Service  
Economic Growth and Localities

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Schedule of ECC comments in response to the First Written Questions

FWQ Ref.	Question to	Question from the Examining Authority	ECC Response to the FWQ
<b>1.4</b>	<b>Consideration of Alternatives</b>		
1.4.1.	Applicant (parts a to d); Thurrock Council, Kent County Council and Essex County Council (parts d, e only).	<p>In ES paragraph 6.36, the Applicant explains that the CMAT facility is <i>“more easily located away from the jetty itself as the process of moving aggregate from self-discharging vessels by conveyor is not distance sensitive.”</i></p> <p>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?</p> <p>b) Would all of the aggregates arriving at the Tilbury2 facility be within self-discharging ships?</p> <p>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?</p> <p>d) Is it essential to co-locate asphalt plants, concrete plants and concrete block making facility close to the source of aggregates?</p> <p>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?</p>	<p>Please find below and attached ECC’s responses to points d) and e):</p> <p><b>d)</b> It is not possible for ECC to confirm whether it is <i>essential</i> for asphalt plants, concrete plants and concrete block making facilities to be located close to the source of aggregates. However, it is considered to be an issue largely driven by market considerations, with profitable end products largely achievable through reasonable controls on variable costs such as transport and handling. There may well be technical specification matters which require onsite processing.</p> <p><b>e)</b> Please find attached a list of transshipment sites and secondary processing plants as safeguarded under policies S9 and S5 of the <a href="#">Essex Minerals Local Plan Adopted 2014</a>.</p> <p>Please note, the list does not include processing plants on standalone industrial estates which is a district matter. This information could be obtained however an extension of time would be required to enable liaison with the respective Essex District/Borough/ City Councils. Please advise.</p>

Schedule of ECC comments in response to the First Written Questions

FWQ Ref.	Question to	Question from the Examining Authority	ECC Response to the FWQ
<b>1.6.</b>	<b>Contaminated Land and Waste</b>		
1.6.3	Thurrock Council (TC), Essex County Council (ECC), Kent County Council (KCC)	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?	ECC is satisfied with the level of detail contained within the SWMP.
<b>1.13.</b>	<b>Historic Environment</b>		
1.13.2.	Applicant/ Essex County Council (ECC)	<p>ECC states [RR-018] that it objects to the Proposed Development in principle, due to considerable harm caused to the setting of Tilbury Fort, a Scheduled Monument of international significance, and also that the effectiveness of proposed mitigation/enhancement appears limited, with further clarity, detail and amendments required:</p> <p>a) Would the Applicant state its response to ECC's position?  b) Would ECC state what in its view should be done to mitigate any harm due to the Proposed Development?</p>	<p>Please find below ECC's responses to points b):</p> <p><b>b)</b> ECC's position on this matter has been updated since the submission of ECC's Relevant Representation, and wish to draw the Examining Authority's attention to SoCG between ECC and POTLL (SOCG003), as submitted by POTLL on the 14<sup>th</sup> February. Below is the relevant extract of ECC's revised position::</p> <p><i>"3.2 Other matters are outside of ECC's statutory function but are matters on which ECC, as a neighbouring authority has an interest in, concerning Landscape and visual impact and Ecology. ECC is minded that Thurrock Council has also raised these issues and is pursuing these matters as the host authority. ECC supports the approach being developed by Thurrock Council and the inclusion of these matters within their SoCG, therefore ECC has no further comments to make on these matters."</i></p> <p><i>3.3 ECC has a service level agreement with Thurrock Council for the provision of advice as: Lead Local Flood Authority and on Historic Environment. Water resources and</i></p>

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			<p><i>flood risk issues; as well as Terrestrial Archaeology and Built Heritage issues are therefore dealt with in the SoCG with Thurrock Council.</i></p> <p>To assist, ECC can also confirm that our Relevant Representation comments on this matter have been captured within the Relevant Representations raised by Historic England and Natural England and we support their approach.</p>
<b>1.14.</b>	<b>Planning Policy</b>		
1.14.4.	Thurrock Council, Essex County Council and Kent County Council	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?	<p>Essex County Council prepares a Local Aggregate Assessment annually to cover the County of Essex and the unitary authorities of Thurrock and Southend-on-Sea. Mineral production information relating to these three administrative areas has historically been amalgamated due to the relatively small amount of workings which take place in Thurrock, which creates issues around commercial confidentiality, and the absence of mineral working in Southend-on-Sea due to its tightly defined, urbanised administrative area.</p> <p>The first LAA was prepared in 2013.</p> <p>All LAAs prepared by ECC are available online:  <a href="http://www.essex.gov.uk/Environment%20Planning/Minerals-Waste-Planning-Team/Planning-Policy/minerals-development-document/Pages/Greater-Essex-Local-Aggregate-Assessment.aspx">http://www.essex.gov.uk/Environment%20Planning/Minerals-Waste-Planning-Team/Planning-Policy/minerals-development-document/Pages/Greater-Essex-Local-Aggregate-Assessment.aspx</a></p>
1.14.6	Thurrock Council, Essex County Council	Are you participants in the East of England Regional Aggregate Working Party (RAWP)? If so, please could you provide any annual reports or other relevant documents prepared by the RAWP that provide information on annual volumes of marine	<p>Essex County Council is an active member of the EoE Aggregate Working Party, with the head of planning currently acting as chair of the group.</p> <p>Annual Monitoring Reports produced by the EoE</p>

Schedule of ECC comments in response to the First Written Questions

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		<p>dredged aggregates, crushed rock and recycled/secondary aggregates that are landed at wharves in Thurrock and Essex together with any RAWP documents may indicate a need for new or replacement</p>	<p>Aggregate Working Party are available online (bottom of the page):  <a href="http://www.centralbedfordshire.gov.uk/planning/minerals-waste/aggregate/overview.aspx">http://www.centralbedfordshire.gov.uk/planning/minerals-waste/aggregate/overview.aspx</a></p> <p>Essex is not host to any active marine-won aggregate wharves; all marine dredged material used in Essex is landed outside of the county and is transported in via rail or road.</p> <p>The EoE AWP reports do not provide information regarding volumes of marine dredged aggregates, crushed rock and recycled/secondary aggregates. Instead the Greater Essex LAA provides context in this regard. Crushed Rock resources do not exist in Greater Essex and therefore the area is entirely reliant on the importation of this mineral. It should be noted that in contrast to primary won minerals, the data regarding secondary/recycled aggregate volumes is poor. The LAA confirms that capacity is under pressure, as permissions for facilities tend to be time limited, largely associated with quarry activities or temporary construction/demolition activities.</p> <p>The adopted Essex Mineral Local Plan sets the policy and context for facilities to address marine dredged aggregates, crushed rock and recycled/secondary aggregates landing needs. The Plan, which covers only the administrative area of Essex County Council, includes a policy seeking to safeguard existing mineral transshipment sites (S9). The supporting text for this policy confirms <i>'No new transshipment sites which would be suitable in the future for establishing rail depots or marine wharves have come forward in the evidence base analysis or following</i></p>

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			<p><i>public consultation. This may be an indication of the difficulty of finding such sites given the demanding criteria that would need to be fulfilled. Currently there is evidence of marine wharves in neighbouring areas providing for some of Essex's aggregate needs, with wharves located in Thurrock, north Kent, east London and Suffolk having the potential to supply Essex'.</i></p> <p>This information remains accurate, and therefore additional capacity in neighbouring authorities is considered to support the aggregate supply in Essex.</p>
<b>1.15.</b>	<b>Landscape and Visual Impacts</b>		
1.15.1.	Applicant/ Essex County Council (ECC)	<p>ECC asserts in its relevant representation [RR-018] that clarification, additional information and mitigation measures are required, and that the majority of proposed landscape mitigation fails to adequately address wider significant adverse visual impacts on the setting of Tilbury Fort and wider surrounds including East and West Tilbury:</p> <p>a) Would ECC provide more detail on where it believes the Applicant's mitigation proposals are deficient?</p> <p>b) Would the Applicant state its response to ECC's assertion above?</p>	<p>ECC's position on this matter has been updated since the submission of ECC's Relevant Representation, and wish to draw the Examining Authority's attention to SoCG version 3, between ECC and POTLL (SOCG003), as submitted by POTLL on the 14th<sup>th</sup> February. Below is the relevant extract of ECC's revised position::</p> <p><i>"3.2 Other matters are outside of ECC's statutory function but are matters on which ECC, as a neighbouring authority has an interest in, concerning Landscape and visual impact and Ecology. ECC is minded that Thurrock Council has also raised these issues and is pursuing these matters as the host authority. ECC supports the approach being developed by Thurrock Council and the inclusion of these matters within their SoCG, therefore ECC has no further comments to make on these matters."</i></p> <p>To assist, ECC can also confirm that our Relevant Representation comments on this matter have been</p>

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			captured within the Relevant Representations raised by Historic England and Natural England and we support their approach.
<b>1.17</b>	<b>Socio-economic effects</b>		
1.17.2	Applicant and Essex County Council (ECC)	<p>ECC asserts in its relevant representation [RR-018] that clarification is required on how the benefits and use of the local supply chain and economy would be realised:</p> <p>a) Would the Applicant state its response to ECC's assertion?                      b) Would ECC specify what clarification is required?</p>	<p>Please find below ECC's response to point b):</p> <p><b>b)</b> ECC can provide the following update and clarification in respect of our relevant representation RR0018:</p> <p>Overall support for the development in principle, with the potential to create direct and indirect employment opportunities and economic growth benefits for the wider Essex economy including delivery of the Lower Thames Crossing and support for the construction industry and associated supply chains. Emphasis should be placed on the use of the local supply chain and economy to realise these benefits.</p> <p>ECC considers the employment catchment for Tilbury does extend beyond Thurrock and that this should be considered when implementing the Skills and Employment Strategy. Furthermore the strategy should take into account and refer to the Essex Employment and Skills Board (which the applicant is aware of) and the role that the Board can play in shaping local educational offers to meet employers requirements</p> <p>Specific details on this are set out below:</p> <ul style="list-style-type: none"> <li>ECC has reviewed the strategy and would endorse current activities towards community engagement particularly "local first" advertisement of opportunities, however taking on board the</li> </ul>

Schedule of ECC comments in response to the First Written Questions

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			<p>identified challenges in terms of local skills levels/aspiration ECC would urge a wider approach to take in Basildon Borough locality. Residents across South Essex do not recognise local authority boundaries.</p> <ul style="list-style-type: none"> <li>• ECC would also recommend enhanced activities with young people's prime influencers parent/carers/ teachers to include expansion of awareness of opportunities both with Port of Tilbury and partner subsidiaries. There is a need to promote advanced apprenticeships and sponsored graduate schemes.</li> <li>• One thing that is evidently missing from the strategy and needs to be addressed is recognition of employees difficulties in accessing sustainable travel to and from work to facilitate shift working within the vicinity of the port (see ECC comments in 1.18.6.c) below). There is also the potential for linkage with such schemes as Arriva click (uber buses).</li> </ul> <p>To conclude, ECC would anticipate an increased need for high level engineering/construction/digital technology skills to support expansion of the port its self, the Lower Thames Crossing, Bradwell B (new nuclear power station), housing/infrastructure development plus the expected industry/employment migration from London, all of which will impact on available labour force.</p>



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<b>1.18</b>	<b>Traffic and Transportation</b>		
1.18.3.	Applicant/ Essex County Council (ECC)/ Highways England (HE)/ Network Rail (NR)	<p>With reference to ECC's relevant representation [RR-018]:</p> <p>a) Would ECC give more detail on its outstanding concern regarding M25 J30 on which the Council requires further clarification?</p> <p>b) Would the Applicant and HE state their response to ECC's request for them to take account of respective proposals to ensure junction capacity?</p> <p>c) Would the Applicant state its response to ECC's request for clarification, information and mitigation concerning sustainable travel modes and provision of public transport to coincide with shift patterns?</p> <p>d) Would the Applicant and NR state their response to ECC's request for clarification on the cumulative impacts on the rail network, passenger and freight capacity, connectivity and network resilience between Essex and London?</p>	<p>Please find below ECC's responses to points a) and d)</p> <p><b>a)</b> ECC however, acknowledges the PoTLL response provided in the Response to Relevant Representations document, stating that M25 J30 is the responsibility of HE, rather than ECC and that the PoTLL is in direct discussions with HE regarding the impact of Tilbury2 on this junction.</p> <p>To assist, the ECC request for clarification is to receive confirmation that Highways England as the responsible highways authority for the strategic road network (namely the M25 J30) are satisfied that the junction has been given due consideration and that the impact of traffic generated by Tilbury2 will either not have an impact on the operation of the junction or that the impact can / will be mitigated.</p> <p>ECC also notes that the Highways England Relevant Representation has also raised questions on this matter.</p> <p>ECC provided POTLL with this clarification on the 16<sup>th</sup> March 2018 and consider this matter to be outstanding.</p> <p><b>d)</b> To assist, ECC's request is for clarification that Network Rail, as the responsible authority, has considered the cumulative impacts of freight growth (PoTLL growth plus other planned freight growth) and passenger growth both on the Essex Thameside line and North London Lines (including Gospel Oak to Barking), including reflecting the aspirations for increased</p>

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			<p>passenger services contained within the Draft London Plan and Mayor’s Transport Strategy. ECC would also like NR to confirm which, if any, of the enhancements projects listed within the Freight Route Study are necessary to support the operation of Tilbury2.</p> <p>ECC also notes that the Relevant Representations from Network Rail Infrastructure Ltd and Kent County Council also raised questions on this matter.</p>
1.18.6	Applicant/ Essex County Council (ECC)/ Thurrock Council (TC)/ Highways England (HE)	<p>The ES [APP-031] Chapter 13 paragraph 13.3 et seq cite the Transport Assessment [APP-072], the Framework Travel Plan [APP-073], and Sustainable Distribution Plan [APP-074]. The latter two documents are secured within the DCO [APP-016] Schedule 2 Part 1 by Requirement 11:</p> <p>a) Would the Applicant state where the Transport Assessment is secured in the DCO?</p> <p>b) Would ECC and TC state whether they are content with the Transport Assessment as currently drafted?</p> <p>c) Would ECC, TC and HE state whether they are content with the Framework Travel Plan and Sustainable Distribution Plan as currently drafted?</p> <p>d) Would the Applicant state whether it intends to update the Framework Travel Plan and</p>	<p>Please find below ECC’s responses to points b) and c). ECC provided POTLL with this clarification on the 16<sup>th</sup> March 2018.</p> <p><b>b)</b> Please find below ECC’s detailed comments on the Traffic Impact Assessment which need to be addressed. Please note the comments below informed ECC’s Relevant Representation (RR0018)</p> <p><b>Section 7 Traffic Impact Assessment</b></p> <p><b>7.4 ASDA Roundabout</b></p> <p>Some concerns exist in relation to the operation of the ASDA roundabout, albeit that this is a Trunk Road roundabout, the modelling appears to indicate that the approach from the docks may experience congestion which may have a knock on effect on the local road network from Tilbury and ASDA. ECC acknowledges that mitigation for this junction is being developed.</p> <p><b>7.6 A1089/A13 Interchange (page 121)</b></p> <p>The assessment of the merge and diverge movements at the A1089 / A13 junction is considered adequate and it shows that movement will operate satisfactorily. We are however</p>

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			<p>concerned that the impact on A13 link capacity is not considered and neither is detail of the impact at M25 Junction 30.</p> <p><b>7.7 A13 / M25 Junction 30 (page 116 of TA) and 6.11.10 Operational (HGV)</b></p> <p>Routing of commercial traffic is generally based on existing port traffic distribution, it is felt that this could be further refined based upon the specific proposed port operations, Ro-Ro traffic will largely travel to/from junction 30, whereas CMAT traffic may be serving more local clients and a larger proportion may turn towards Essex. The use of the trip characteristic of the existing port and of journey to work data for employees, is a most appropriate approach.</p> <p><b>Impact of Lower Thames Crossing.</b></p> <p>It is noted that ECC is concerned that the impact of the proposed Lower Thames Crossing has not been covered in the transport assessment and it is not planned to do so. While the concern is understood, it needs to be considered that the Environmental Assessment and Transport Assessment for the Lower Thames Crossing is in Scoping Stage and that it may not be possible to incorporate its impact on the current Tilbury2 Transport Assessment. It falls to Lower Thames Crossing proposals to take account of Tilbury 2 as an existing development.</p> <p>However, based on all indications the presence of the Lower Thames Crossing would ease rather than worsen the impact on those roads that affect ECC and the county's residents and businesses. The Lower Thames Crossing may well add vitality</p>

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			<p>to the Tilbury2 development, Thurrock and Southend, with positive transport impacts and little negative impacts.</p> <p><b><u>Section 10 Summary &amp; Conclusion</u></b>  <b>Construction Traffic – 10.1.42 to 10.1.44 (page 138)</b>            Construction traffic presents no specific concerns, its access routes will be controlled and the trip generation of the completed facility far exceeds the construction traffic volumes.</p> <p><b>c)</b> ECC can provide the following specific comments in relation to the Framework Travel Plan, which have been supplied to the Applicant to assist in addressing ECC’s request for clarification (as set out in 1.18.3 c) above.</p> <p>ECC has also reviewed the Sustainable Distribution Plan and has outlined our comments below:</p> <p><b>FRAMEWORK TRAVEL PLAN DOCUMENT REF: 6.2 13.B (ES APPENDIX 13.B)</b></p> <p><b>ECC General Comments:</b>            ECC, Southend Borough Council and Thurrock Borough Council are currently working on a 3 year DfT funded Access Fund project to enable residents to access employment and training opportunities via Active Travel. The South Essex Active Travel (SEAT) project is due to complete on 31st March 2020. Within the project there are opportunities for businesses to get involved with cycle training, personal travel planning for employees and walking/cycling initiatives. There may be some legacy projects following on from the conclusion of SEAT that Tilbury Port Terminal could access.</p>

Schedule of ECC comments in response to the First Written Questions

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			<p><b>2.2: Staff Employed at the Site:</b>  Clarification is required on</p> <ul style="list-style-type: none"> <li>- The numbers of staff per shift for both the port staff and the CMAT staff?</li> <li>- Whether there will be double the number of staff on site at the start/end of each shift as the shifts change over?</li> </ul> <p><b>3.4: Public Transportation:</b>  <b>3.4.1: Bus:</b>  Clarification is required on how the proposed measures to promote public transport will enable the CMAT and main workforce at Tilbury 2 to effectively use the public transport to travel <u>to and from</u> work? ECC would have anticipated the Travel Framework Plan to have explored the extent of the existing service, the 99 bus service, which operates between 05:40-19:05, and the proposed shift patterns of both the CMAT and specifically the main workforce of 100 staff, which is split across 3 shift patterns of 0600-1400; 1400-2200; and 2200-0600 hours.</p> <p>At present the only proposed measures to promote public transport is a new bus stop, however there is no consideration or mitigation proposed on how the main workforce would be able to effectively use the public transport (both ways), given that that their shift patterns do not coincide with the existing operating hours of the bus service.</p> <p>ECC would have anticipated PoTLL to seek to enhance the operating hours of the bus service, which could be explored in liaison with DP World London Gateway, as they are relatively</p>

Schedule of ECC comments in response to the First Written Questions

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			<p>nearby and will have similar shift patterns with staff travelling from similar locations.</p> <p><b>6.2.5: Pedestrian and Cycle Infrastructure:</b> ECC seeks clarification on the additional staff facilities to be provided and recommend the provision of lockers for staff to store walking/cycling gear and a drying room for people to dry wet weather clothes.</p> <p><b>7.1 Marketing and Promotion:</b> ECC seeks further consideration and clarification on the approach to promoting sustainable travel modes by PoTLL with the new workforce, to encourage a modal travel shift. Examples and opportunities in the area include the support provided by the SEAT team, with Amazon to deliver Personal Travel Plans via Liftshare’s My PTP to all new recruits as part of their employment checks at their Tilbury site.</p> <p><b>SUSTAINABLE DISTRIBUTION PLAN</b> ECC welcomes the preparation of the sustainable Distribution Plan and the proposals to form a Sustainable Travel Group to work with tenants to implement the final version of the Framework Travel Plan. Please see ECC’s comments above regarding outstanding clarification and revisions required to the Framework Travel Plan.</p> <p>Please also refer to ECC’s comments regarding the socio economic benefits set out in response to FWQ 1.17.2.</p>

ECC List of sites in respect of FWQ Ref 1.4.1. e) – Consideration of Alternatives

The Essex Mineral Local Plan was adopted in 2014. It can be accessed here:  
<https://www.essex.gov.uk/Environment%20Planning/Minerals-Waste-Planning-Team/Planning-Policy/minerals-development-document/Documents/Essex%20Minerals%20Plan%20-%20Adopted%20July%202014.pdf>

**Policy S9** of the Essex Mineral Local Plan (2014) safeguards mineral transshipment sites and secondary processing facilities as follows:

Name of Site	Transshipment Sites	Coated Stone Plant	Cement Batching	Aggregate Recycling
Chelmsford Rail Dept	√			
Harlow Mill Rail Station	√	√	√	
Marks Tey Rail Dept	√			
Ballast Quay, Fingringhoe	√ (limited to current permitted mineral operation- no onward transport via road)			
Parkeston Quay East, Harwich	√			
Sutton Wharf, Rochford	X	√		
Stanway, Colchester	X	√		
Wivenhoe, Colchester	X	√		
Bulls Lodge Chelmsford	X	√		
Essex Regiment Way	X	√		

Policy S5 of the Mineral Local Plan identifies and safeguards Strategic Aggregate Recycling Facilities across Essex as follows:

- Purdey's Industrial Estate SARS
- Bulls Lodge SARS (linked to the life of the quarry)
- Stanway SARS (linked to the life of the quarry)

A location map of each facility can be found in Appendix Three of the Plan.

From: [Lesley Stenhouse, Principal Spatial Planner](#)  
 To: [Lesley Stenhouse, Principal Spatial Planner](#)  
 Subject: RE: Tilbury2 - Relevant Reps - Highways  
 Date: 20 March 2018 19:36:01  
 Attachments: [image001.png](#)

**From:** Lesley Stenhouse, Principal Spatial Planner  
**Sent:** 15 March 2018 17:41  
**To:** 'Phil Hamshaw'; Beverley Gould, Principal Transport Strategy & Engagement Officer; Alastair Southgate, Transport Strategy Manager  
**Cc:** 'Martin Friend'; Philip Reilly; Tilbury2; John Speakman  
**Subject:** RE: Tilbury2 - Relevant Reps - Highways  
**Importance:** High

Phil / Martin

Firstly please accept our apology for the delay in responding to your emails below, seeking further information on ECC's relevant representation, which appears to stem from the 500 word limit that we kept to.

Please find below our comments to the points raised in your email of 5<sup>th</sup> February which I repeated below for ease of reference. For clarification, our comments are set out in a box below your questions which you set out in red

*Highways and Transportation*

*Transport Assessment. Overall methodology considered sound. ECC maintains an outstanding concern regarding M25 J30 and require further clarification. I don't recall a concern with M25J30, however could you let me know what clarification you require please.*

ECC's request for clarification is to receive confirmation that Highway England as the responsible highways authority for the strategic road network (namely the M25 J30) are satisfied that the junction has been given due consideration and that the impact of traffic generated by Tilbury2 will either not have an impact on the operation of the junction or that the impact can / will be mitigated.

*Lower Thames Crossing. ECC expect Tilbury 2 & LTC to take account of respective proposals to ensure junction capacity. Noted.*

*Framework Travel Plan. Clarification, information and mitigation required concerning sustainable travel modes and provision of public transport to coincide with shift patterns. I recall your colleagues were to review the FTP. If you could provide their comments we can respond.*

ES Appendix 13.B: Framework Travel Plan Document Ref: 6.2 13.B	
	<p><b>General Comments:</b>            ECC, Southend Borough Council and Thurrock Borough Council are currently working on a 3 year DfT funded Access Fund project to enable residents to access employment and training opportunities via Active Travel. The South Essex Active Travel (SEAT) project is due to complete on 31st March 2020. Within the project there are opportunities for businesses to get involved with cycle training, personal travel planning for employees and walking/cycling initiatives. There may be some legacy projects following on from the conclusion of SEAT that Tilbury Port Terminal could access.</p>
2.2	<p><b>2.2: Staff Employed at the Site:</b>            Clarification is required on</p> <ul style="list-style-type: none"> <li>- The numbers of staff per shift for both the port staff and the CMAT staff?</li> <li>- Whether there will be double the number of staff on site at the start/end of each shift as the shifts change over?</li> </ul>
3.4	<p><b>3.4: Public Transportation:</b>  <b>3.4.1: Bus:</b>            Clarification is required on how the proposed measures to promote public transport will enable the CMAT and main workforce at Tilbury 2 to effectively use the public transport to travel <u>to and from</u> work? ECC would have anticipated the Travel Framework Plan to have explored the extent of the existing service, the 99 bus service, which operates between 05:40-19:05, and the proposed shift patterns of both the CMAT and specifically the main workforce of 100 staff, which is split across 3 shift patterns of 0600-1400; 1400-2200; and 2200-0600 hours.</p> <p>At present the only proposed measures to promote public transport is a new bus stop, however there is no consideration or mitigation proposed on how the main workforce would be able to effectively use the public transport (both ways), given that their shift patterns do not coincide with the existing operating hours of the bus service.</p> <p>ECC would have anticipated PoTLL to seek to enhance the operating hours of the bus service, which could be explored in liaison with DP World London Gateway, as they are relatively nearby and will have similar shift patterns with staff travelling from similar locations.</p>
6.2.5	<p><b>6.2.5: Pedestrian and Cycle Infrastructure:</b>            ECC seeks clarification on the additional staff facilities to be provided and recommend the provision of lockers for staff to store walking/cycling gear and a drying room for people to dry wet weather clothes.</p>
7.1	<p><b>7.1 Marketing and Promotion:</b>            ECC seeks further consideration and clarification on the approach to promoting sustainable travel modes by PoTLL with the new workforce, to encourage a modal travel shift. Examples and opportunities in the area include the support provided by the SEAT team, with Amazon to deliver Personal Travel Plans via Liftshare's My PTP to all new recruits as part of their employment checks at their Tilbury site.</p>

*Rail Freight. Seek reconsideration by Network Rail (and PoTLL) on the timing and priority of relevant enhancements in the 2017 Freight Network Study. Clarification required on the cumulative impacts on the rail network, passenger and freight capacity, connectivity and network resilience between Essex and London. Noted, we will provide clarification*

*All transport impacts will need to be mitigated. Noted*



I trust this is of assistance and I shall separately with Martin in respect of the revised SoCG.  
Regards  
Lesley

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