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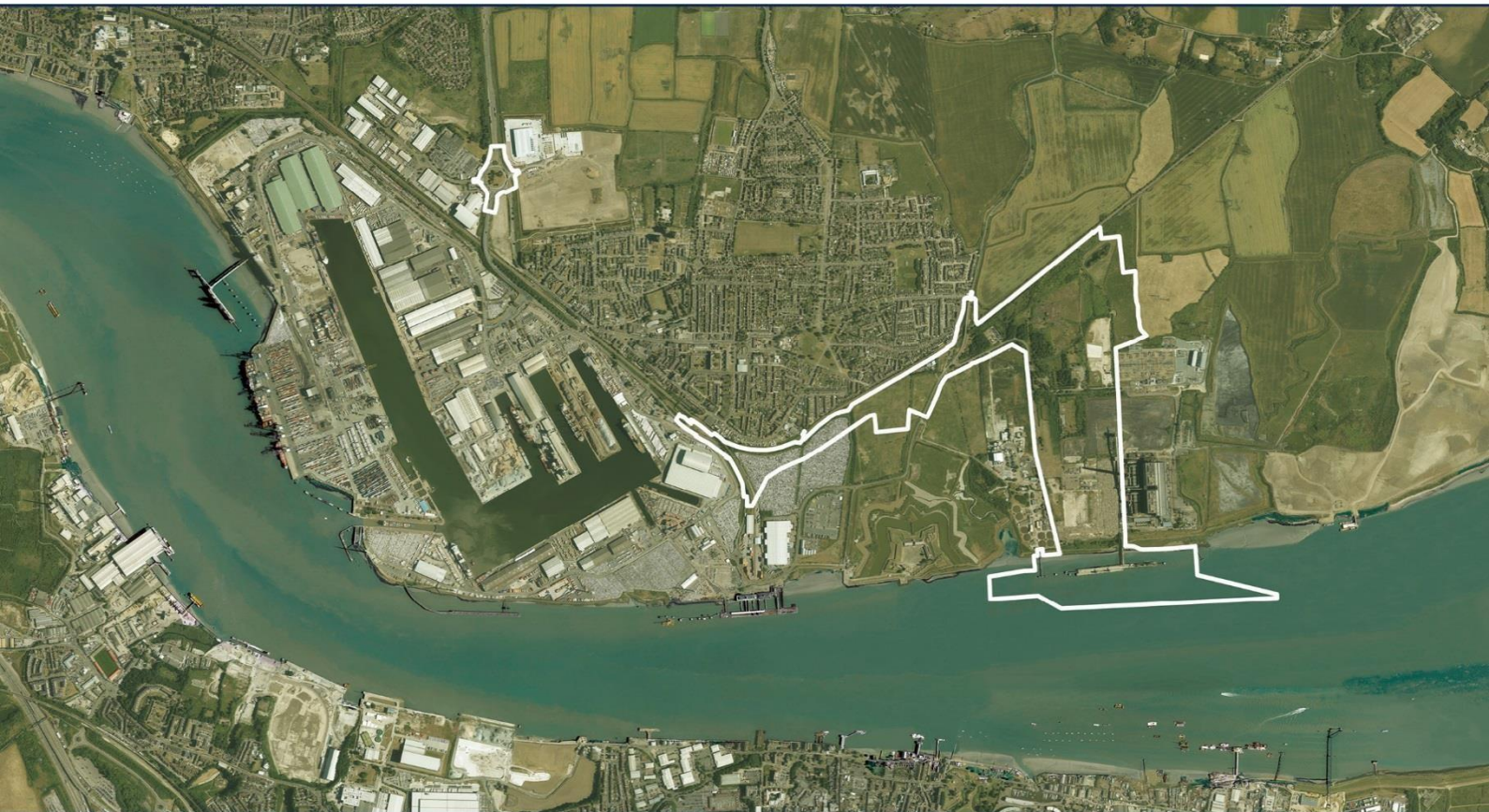
PROPOSED PORT TERMINAL AT FORMER TILBURY POWER STATION

TILBURY2

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SUSTAINABLE DISTRIBUTION PLAN v1 - TRACK CHANGES

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SUSTAINABLE DISTRIBUTION PLAN

PROPOSED PORT TERMINAL AT FORMER TILBURY POWER STATION, TILBURY2

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SECTION 1 INTRODUCTION

1.1.1 This Sustainable Distribution Plan has been prepared on behalf of the Port of Tilbury London Limited in relation to the proposed Port Terminal at the Former Tilbury Power Station, Tilbury. The proposed development is described in Section 2.

1.1.2 This Sustainable Distribution Plan (SDP) aims to ensure that HGV movements can be minimised and that measures are promoted to reduce HGV impact on the network. A Framework Travel Plan (Document *reference: 6.2.13B*) has been prepared to encourage sustainable travel among the staff employed at the proposed development. This SDP should therefore be read in conjunction with the Framework Travel Plan to understand the holistic approach to demand management measures for the Tilbury2 proposals. [The FTP and SDP are companion documents.](#)

1.1.3 Compliance with this document is secured through a requirement in the DCO.

1.2 Transport Policy Context

National Policy Statement for Ports (January 2012)

1.2.1 The National Policy Statement (NPS) for Ports is part of the planning system established under the 2008 Act to deal with national significant infrastructure proposals such as Tilbury2. The NPS provides the framework for decisions on new port development.

1.2.2 The requirement for demand management measures is identified as a key tool to address the off-site traffic impacts of Port development, in the NPS for Ports. Paragraph 5.4.11:

“Where mitigation is needed, possible demand management measures must be considered and, if feasible and operationally reasonable, required before considering conditions for the provision of new inland transport infrastructure.”

1.2.3 It is identified in Paragraph 5.4.14 of the NPS for Ports that:

“The modal share of the traffic entering and leaving the port needs to be considered objectively in the context of external congestion and environmental costs. Broadly speaking, rail and coastal or inland shipping should be encouraged over road transport, where cost-effective, but requirements or obligations, if they are necessary in order to avoid significant detriment to network users, should be evidence based and present efficient incentives.”

- 1.2.4 The NPS for Ports is therefore explicit that demand management measures should be considered prior to the delivery of infrastructure improvements and modal shift measures should be encouraged to minimise the off-site traffic impacts of HGV traffic.

National Planning Policy Framework (March 2012)

- 1.2.5 The National Planning Policy Framework (NPPF) (March 2012) identifies the transport policy background for new developments. It is stated in paragraph 34:

“Plans and decisions should ensure that developments that generate significant movement are located where the need to travel will be minimised and the use of sustainable transport modes can be maximised.”

- 1.2.6 This SDP identifies how the use of sustainable modes will be maximised in relation to the freight movements to and from the development, to reduce the impact of the proposed development on the local and strategic highway network.

Highways England: The Strategic Network; Planning for the Future (September 2015)

- 1.2.7 Highways England are responsible for the Strategic Road Network. In relation to the network adjacent to the proposals this includes the A1089 St Andrews Road, A1089 Dock Road, A13 and M25. On this basis, it is appropriate that the Sustainable Distribution Plan complies with guidance from Highways England.

- 1.2.8 Highways England set out their approach to engaging in the planning system, in ‘The Strategic Network; Planning for the Future.’ Highways England identify that demand management measures should be considered to minimise the level of mitigation required. It is stated that developers:

“Should take all reasonable steps to minimise the level of physical mitigation required, through the use of measures such as Travel Plans and travel demand management measures, such as development phasing, HGV booking systems and encouraging flexible working and sustainable travel.”

Thurrock Council Core Strategy and Policies for Management of Development (January 2015)

- 1.2.9 The Core Strategy provides the strategic policies for development in Thurrock against which planning applications for the development and use of land and buildings are considered, to ensure that development occurs in the most appropriate location.

1.2.10 Policy CSTP17 'Strategic Freight Movement and Access to Ports' states that the council will support the logistics and port sectors, and the positive impacts of freight activity in Thurrock and beyond, by:

"1. Facilitating a shift to rail freight and freight carried on the River Thames. This will be through:

- i. Protecting inter-modal, rail and water-borne freight facilities from other development at locations where a demand exists or is expected to exist;**
- ii. Promoting the use of rail and water borne freight facilities by supporting the development of appropriate infrastructure;**
- iii. Support improvements to facilitate sustainable freight movements, including the rail hub at London Gateway, the South West Thurrock Railhead and improving access to the ports.**

2. Facilitating the provision of 24-hour lorry parks at Tilbury Port, London Gateway and West Thurrock. Subject to compliance with other policies in this plan, other lorry parks will be considered in locations where demand can be shown to exist, which are located away from residential areas and have good access to the Strategic Road Network;

3. Working as part of a Freight Quality Partnership and with other relevant partners, in order to:

- i. Maximise modal shift opportunities;**
- ii. Ensure freight traffic keeps to the most suitable routes as defined in Thurrock Council's Road Network Hierarchy;**
- iii. Promote the use of less polluting freight vehicles; and**
- iv. Reduce the adverse impact of congestion caused by road freight on the A13, A1089 and A1306.**

1.2.11 Policy PMD11 'Freight Movement' requires all developments exceeding the equivalent of 200 daily HGV movements to produce a Sustainable Distribution Plan, which should include evidence that commercially viable opportunities for freight carried by rail, water, pipeline or conveyor have been maximised. This SDP has therefore been prepared in accordance with the requirements set out in Thurrock Council's Core Strategy and with regard to the above strategic policy context.

1.3 Structure

1.3.1 The remainder of this report is structured as follows:

- Section 2 – summarises the Proposed Development;
- Section 3– sets out the objectives and benefits of the SDP;
- Section 4 – describes the role of the Sustainable Travel Coordinator in relation to the SDP;
- Section 5 – identifies the measures to achieve the objectives; and
- Section 6 – provides a summary.

SECTION 2 PROPOSED DEVELOPMENT

2.1 Overview

2.1.1 The proposed main uses on the site will be Roll-on / Roll-off (Ro-Ro) terminal for containers and trailers, a Construction Materials and Aggregates Terminal (CMAT) and storage areas (which will either be bulk material or vehicles).

2.1.2 The CMAT would comprise a number of permanent uses and structures as follows:

- Aggregates Storage Yard – external storage areas for aggregate materials, including a silo, to store imported materials before being exported;
- Asphalt Batching Plant – a facility to combine materials to create asphalt;
- Concrete Batching Plant – a facility to combine materials to create concrete;
- Construction Block Manufacturing Facility – a facility to combine materials to create construction blocks; and
- Cementitious Powder Products – including a silo, to store imported materials before being exported.

2.1.3 The proposals would require works including, but not limited to:

- Creation of hard surfaced pavements;
- Improvement of and extensions to the existing river jetty including creation of a new RoRo berth;
- Associated dredging of berth pockets around the proposed and extended jetty and dredging of the approaches to these berth pockets;
- New and improved conveyors;
- Erection of ancillary buildings;
- A number of storage and production structures associated with the CMAT;
- The construction of a new link road from Ferry Road to Fort Road; and
- Formation of a rail spur and sidings.

2.2 Vehicular Access

2.2.1 Access to the site will be achieved via the creation of a new link road between Ferry Road and Fort Road, this will connect to the alignment of the existing site access road (the Link Road). This new link road will enable Fort Road to the east of the Fortress Distribution Park and the south of the proposed link road to be downgraded.

2.3 HGV Parking

2.3.1 In accordance with the NPS for Ports, sufficient provision for HGV parking will be made within the site, to avoid queuing on approach roads. It is identified in Thurrock Council's draft parking standards that HGV parking should be provided based on operational requirements (details on the operational requirements are contained in the Transport Assessment - Document reference: 6.2.13A).

2.3.2 On-site welfare facilities will be provided on the Tilbury2 site, which will assist in reducing the likelihood of indiscriminate HGV parking occurring on roads within the vicinity of the site. A large area within the site will be provided for the operation of the proposed Ro-Ro terminal, which will allow for the parking, storage and turning of trailers.

2.3.3 The typical operation of Tilbury2 would be a regular pattern of arrivals and departures of HGV's. Thus, there would be no accumulation of HGV's. Therefore, there would be no need for dedicated HGV parking as such, but instead 'holding operational areas' where arriving and departing vehicles are processed will be provided. The masterplan layout (Document Reference APP-008) shows that the principal operations of the CMAT and RoRo would have substantial holding operational areas which will fully accommodate such operation.

2.3.4 The General Arrangement drawings (Document Reference: APP-008) illustrate that the operational areas for the CMAT and Ro-Ro are circa 16 Ha and circa 26Ha respectively. The operational areas will be designed to cater for the required number of HGV's arriving at the Port and will provide ample areas to be used for parking.

2.3.5 In addition, the internal road network would extend over 2km and would enable vehicles (who for operational reasons arrive early or are delayed) to enter the port and wait safely in areas off the public highway.

2.3.6 The proposal is therefore designed to accord with the requirements of the NPS for Ports, by making sufficient provision of HGV parking.

SECTION 3 OBJECTIVES AND BENEFITS

3.1 Objectives

3.1.1 The overarching purpose of the SDP is to manage freight traffic to minimise HGV demand on the strategic and local highway network. In this context, the key objectives of the SDP are to:

- Manage HGV movements outside of the peak periods;
- Encourage optimum use of non-road based freight transport modes; and
- Encourage optimum utilisation of HGV vehicle capacity.

3.1.2 The anticipated outcomes of these objectives include:

- Less congestion (reduced delay and costs) on strategic and local roads; and
- Local environmental improvements from reduced congestion, pollution and noise.

3.1.3 All of the measures will assist TC and Highways England (HE) in meeting their objectives in terms of reducing the dependence on road based freight transport, particularly by improving the optimum use of non-road based freight modes.

3.1.4 The measures accord with the National Policy Statement (NPS) for Ports, which states:

“Where mitigation is needed, possible demand management measures must be considered and, if feasible and operationally reasonable, required before considering conditions for the provision of new inland transport infrastructure to deal with the remaining transport impacts is determined.”

3.1.5 The SDP therefore identifies the demand management measures to be applied to assist in minimising HGV traffic generated by the proposed development.

3.2 Benefits of a SDP

3.2.1 The development of a SDP has a number of benefits for the freight operators as well as the existing local community and surrounding environment.

Freight Operators

3.2.2 The SDP will benefit freight operators in a number of ways, including the following:

- More efficient use of freight fleet through optimising HGV vehicle capacity;
- Reduction in road freight miles through use of alternative modes such as rail and river freight;
- Improved fuel economy through efficient driving practices; and
- Reduced wear and tear of vehicle fleet.

Local Community and Environment

3.2.3 The SDP for the proposals will benefit existing residents in the local area in a number of ways. The SDP will seek to minimise the overall impact of freight traffic generated by the proposed development on the local highway network.

3.2.4 The potential benefits to the environment, compared to the 'without SDP' scenario, are as follows:

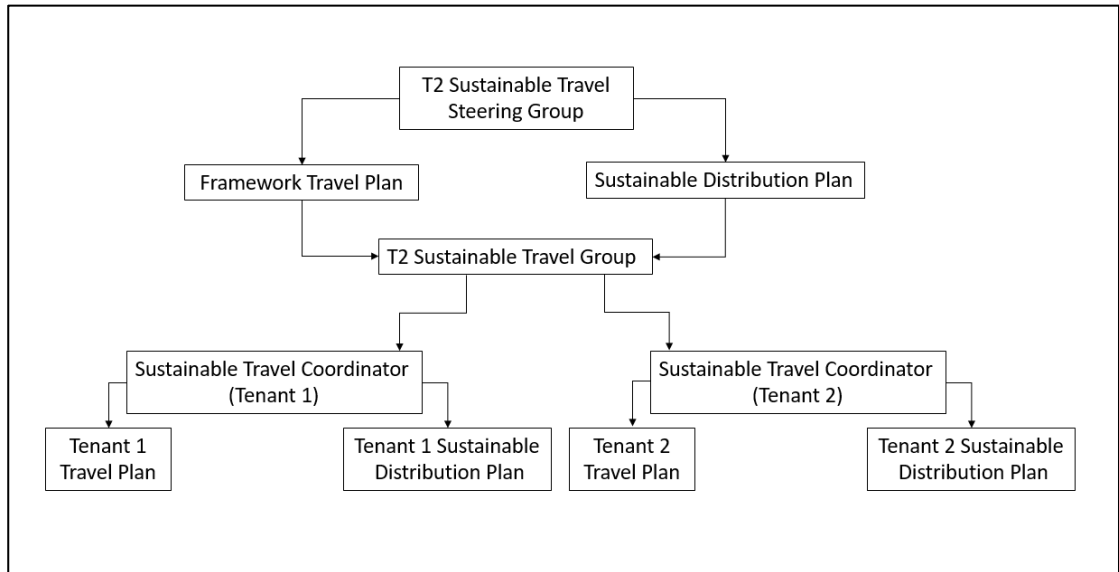
- The impact of the development will be lessened in terms of congestion created by vehicle trips to and from the site;
- Freight users will be encouraged to fit sensors and cameras on their vehicles to detect when a pedestrian or cyclist is near, therefore improving the safety of the vehicles; and
- Fewer vehicular movements to and from the site will reduce pollution levels and contribute to a reduction in vehicular turning movements at the junctions local to the site. This will contribute to both local air quality management and national climate change reductions.

3.2.5 Overall, it is anticipated that the SDP will result in benefits for the proposed tenants of the site and the wider community in the vicinity of the development.

SECTION 4 SUSTAINABLE TRAVEL COORDINATOR

- 4.1.1 The coordination of the SDP will be managed by the Tilbury2 Sustainable Travel Group. The group will consist of representatives from each of the tenant businesses at the site and a representative from PoTLL. The Tilbury2 Sustainable Travel Group will also be responsible for the management of the Framework Travel Plan.
- 4.1.2 A member of staff (admin/management) within each of the tenant businesses, including PoTLL, will take on the role of Sustainable Travel Coordinator (STC) as part of their duties. The STC will be responsible for managing a specific tenant SDP, including PoTLL, for their business which must be developed in general accordance with this overarching SDP. Each Tenant SDP will be consulted upon with the Tilbury2 Sustainable Travel Steering Group before completion to ensure a consistent and coordinated approach. Each STC will be required to attend meetings with the Tilbury2 Sustainable Travel Group. The group will meet every **three** months for two-years from the date the first part of the site is occupied and annually thereafter for up to five years, or longer if all parties agree.
- 4.1.3 One member of the Tilbury2 Sustainable Travel Group will be nominated to liaise with the Tilbury2 Sustainable Travel Steering Group, comprising a representative from each of the highway authorities (Thurrock Council and Highways England), Thurrock Council's sustainable travel coordinator who will provide oversight of the Sustainable Distribution Plan and Travel Plan for each tenant and a representative from the Tilbury Community Forum. PoTLL will also attend the Tilbury2 Sustainable Travel Steering Group. It is important to note that PoTLL are also present on the London Distribution Park Steering Group and will therefore assist in providing a coordinated approach to sustainable travel within Tilbury.
- 4.1.4 Plate 4.1 illustrates how the Framework Travel Plan and the Sustainable Distribution Plan will be managed.

Plate 4.1: Framework Travel Plan and Sustainable Distribution Plan Structure



4.1.5 The steering group will meet every **three** months during the first two-years from the date the first part of the site is occupied and annually thereafter for at least five-years after first occupation, or longer if all parties agree.

4.1.6 The role of the STC will be as follows:

- Take responsibility for the delivery of the Tenant Sustainable Distribution Plan;
- Give a ‘human face’ to the Tenant Sustainable Distribution Plans. The STC will ensure that all relevant parties receive information regarding the SDP;
- Raise awareness of the SDP amongst staff and freight users;
- Manage the Freight Information Portal;
- Liaise with representatives from within the business to ensure the SDP meets the different requirements of their organisation; and
- Undertake a review of the proposed measures and **if targets not achieved** identify new measures if required.

SECTION 5 MEASURES

5.1 Introduction

5.1.1 The key measures of the SDP is the promotion of modal shift and provision of information to freight operators regarding the opportunities for the reduction of freight movements and details of the benefits that can be brought about.

5.2 Measures

Modal Shift

5.2.1 As an experienced operator of the existing Port of Tilbury, PoTLL have, and are committed to continuing to invest in, improved rail facilities to encourage modal shift. For example, PoTLL have a £600K capital investment programme for improvements to the rail network:

- Completion of a repurposed 400m facility to accommodate 20 wagon sets, with loading undertaken via a Seneboggen;
- Reactivation of Mini Rail Head in order to provide a reliable alternative to current feeder operations and providing daily connecting service(s) to Northern Europe; and
- Opening of the proposed new 18m rail head at Tilbury2 including new rail link and siding.

5.2.2 The T2 proposals (along with other rail infrastructure investment) demonstrates the commitment of POTLL to transport goods by rail through the inclusion of a new dedicated connection integrated with the CMAT and RoRo to enable efficient transport of aggregates by rail. Network Rail have confirmed that there is considerable spare capacity on the adjoining rail network to accommodate the additional demand that the T2 proposals could generate.

5.2.3 As is explained in the Transport Assessment (document reference 6.2.13A) and Chapter 5 of the ES (document reference 6.1.5), in relation to the proposed development at Tilbury2, it is estimated that the Aggregates Distribution Yard will generate a total import and export of 1,600,000 tonnes per year. It is anticipated that the aggregates will be exported as follows:

- 700,000 tonnes exported by rail;
- 150,000 tonnes exported by river; and
- 750,000 tonnes exported by road.

5.2.4 It is therefore proposed to import/export 53% of Aggregate via alternative modes to HGV, which is a significant proportion. This should be compared to the national average for aggregates of around 10%, with a higher proportion (28%) of cement products transported by rail (Summary of Sustainable Development Data 2016, Mineral Products Association). The higher percentage at Tilbury2 reflects the nature and location of the Tilbury2 operation. As noted by the Minerals Products Association¹ the average journey distance by road for aggregates is approximately 30 miles. Beyond this distance the cost of transporting aggregate by road becomes uneconomic and rail becomes the most viable option. Tilbury2 will serve a large catchment across the South East/Midlands most of which is located more than 30 miles from Tilbury. Thus, to offer an economically viable operation a rail connection is vital.

5.2.5 All the major aggregate operators use rail transport routinely across the UK and continue to invest in increasing the proportion of material transported by rail. For example, CEMEX recently operated a 34 wagon train between Cardiff and London which carried 60% more than normal freight trains. All major operators are committed to further increasing the proportion of product they transport by rail, with all recognizing the contribution rail can make to reduced emissions. All have published Sustainability Strategies/Policies/objectives to reduce emissions, with increased use of rail a key part of their approach.

5.2.6 In addition, many of the main asphalt and cement businesses who would receive raw materials from Tilbury2 have rail connected facilities and require large volumes of aggregate which can only viably be transported by rail. Without a rail connection Tilbury2 would limits its ability to serve customers across the region.

¹ http://www.mineralproducts.org/documents/MPA_SD_Summary_2016.pdf

5.2.7 Similarly, the existing Port of Tilbury has operational rail connections providing a multi-modal operation for tenants. Tilbury2 will have similar tenants and those likely to occupy the CMAT will require rail facilities to enable them to serve their customers across the region.

5.2.8 At this stage it has been assumed that the CMAT will provide the majority of the demand for rail transport. However, the Ro-Ro and vehicle storage operations could equally require the use of rail to transport goods to and from Tilbury2. Statistics suggest continued growth in the use of rail for these types of freight. Tilbury2 has been designed with the rail sidings continuing into the Ro-Ro area with dedicated sidings, thus enabling the convenient and efficient use of rail by Ro-Ro tenants (or itself) on the site. The proposed rail head/siding/connection is designed with passive provision for future expansion of rail capacity at Tilbury2 through an additional arrival/departure siding. Usage of this would further provide the opportunity for increased mode share by rail.

5.2.9 It is clear the Tilbury2 development provides a substantial commitment to the use of rail with considerable investment in new facilities. Similarly, the industry regularly uses rail for transporting goods particularly from Ports, all of which have active rail connections. The combination of Tilbury2 investment and operator's requirements provide a sound basis for enabling a substantial proportion of material to be transported by rail. Furthermore, with POTLL and operators (tenants) becoming members of the Sustainable Travel Steering Group, there will be ongoing opportunities to tap into their knowledge and experience and explore further growth in rail.

5.2.10 The PoTLL has agreed to work with London Gateway to ensure there is sufficient capacity on the rail network to accommodate predicted volumes. The Sustainable Travel Steering Group provides an appropriate forum through which PoTLL can work with Network Rail (and other stakeholders) to ensure the predicted volumes by rail can be achieved.

Vehicle Optimisation

5.2.11 Tenant Sustainable Distribution Plans will include measures to encourage freight operators to optimise their use and management of road freight, including, but not limited to:

- Formal freight routing to deter the use of local roads (including an explicit requirement to use the infrastructure corridor when approaching the Tilbury2 site from the west) and encouraging the use of the strategic road network;
- Details on how HGV movements to and from the site will be reduced through the use of measures such as backhauling, optimising HGV capacity and minimising empty vehicles;
- Details on how the rail and river infrastructure provided with Tilbury2 will be utilised to reduce vehicle movements; and
- Use of a HGV management system to assist with the temporal distribution of freight traffic throughout the day, where practicable.

5.2.12 In addition, operators will be encouraged to fit sensors and cameras on their vehicles to detect when a pedestrian or cyclist is near, therefore improving the safety of the vehicles.

Thurrock Council's Freight Quality Partnership

5.2.13 Tenants and PoTLL will sign up to Thurrock Council's Freight Quality Partnership (or its successor), which is currently undergoing a refresh and relaunch. The Freight Quality Partnership offers access to a safe and fuel-efficient driver programme, provides advice relating to improving fleet efficiency and provides a forum for discussing issues relating to freight traffic. The following benefits are offered by the Freight Quality Partnership:

- It provides a means for local businesses, the freight industry, the local community and Thurrock Council to work together and find local solutions to local freight, delivery and servicing issues;
- It offers a free green fleet efficiency survey for freight operators and their contractors, with the production of a road map of suggestions for improving fleet efficiency by joining the Thurrock Efficient and Cleaner Operations Stars scheme (ECO Stars); and
- It provides a forum for influencing the local authority and national government policy affecting freight transport.

Freight Information Portal

5.2.14 As part of the site's website (www.tilbury2.co.uk) it is proposed to include a link to the 'Freight Information Portal', which will include the following:

- Information relating to rail and transshipment freight transport facilities and opportunities;
- Information relating to the Port development (including promotional information regarding the benefits of importation of goods via the port and port/park synergy);
- Information regarding Thurrock Freight Quality Partnership;
- Information regarding planned works on the transport network (subject to the availability of such information from the service provider);
- A forum for sharing information by Occupiers and hauliers;
- Information regarding preferred access routes to Tilbury2 and local highway restrictions such as weight limits;
- Promotional information highlighting the benefits of planning road freight movements outside the traditional peak periods; and
- Promotional information regarding best practice schemes such as 'Ecostars.'

HGV Parking

5.2.15 As identified in Section 2, sufficient HGV parking will be provided on-site to accommodate the anticipated demand associated with the CMAT and RoRo operations, with on-site welfare facilities provided for the drivers of the vehicles. The use of the HGV parking and welfare facilities will be managed as part of the Tenants SDP to ensure that the facilities are meeting the requirements of the users. The Tenant and PoTLL SDPs would include plans showing how the layout would accommodate HGV (and vehicle) parking in appropriately allocated areas.

Vehicle Arrival and Departure Times

5.2.16 Peak periods on the local highway network generally occur during the weekday mornings (08:15 to 09:15) and evenings (17:00 to 18:00). As part of the SDP, it is proposed to manage arrivals and departures to the proposals outside of these peak periods where possible. A strategy in line with the objectives of this document will be developed by the tenants and PoTLL through the tenant and PoTLL SDPs and consulted upon through the Tilbury2 Sustainable Travel Steering Group. The strategies will develop procedures, in consultation with the Tilbury2 Sustainable Travel Steering Group, to enable activities to be coordinated between tenants and PoTLL to minimise HGV movements arising from Tilbury2 during peak periods where practicable.

5.3 **Monitoring**

5.3.1 As part of the SDP it is proposed to monitor the following:

- HGV utilisation – monitoring of HGV's entering and exiting the site;
- HGV parking – monitoring of the use of the parking spaces within the site and the welfare facilities;
- Arrival and departure times for HGVs; and
- Modal shift – monitoring of the amount of materials exported / imported by rail and river.

5.3.2 In accordance with the Framework Travel Plan, the SDP will be monitored for a period of five-years after the first occupation of the site. It is estimated that the development will be first occupied in 2020.

5.3.3 Monitoring of the SDP's progress will take place annually. The first full survey will be undertaken one year after the first occupation on the site to ensure an established critical mass of tenants. Surveys will take place annually for a period of 5 years for the principal tenants in CMAT and Ro-Ro. Thus, monitoring will continue for 5 years from occupation of last tenant in either to CMAT or Ro-Ro. Monitoring will continue longer if agreed by the Tilbury2 Sustainable Travel Group. The results of the monitoring will be reported to the Tilbury2 Sustainable Travel Group and the Tilbury2 Sustainable Travel Steering Group who will agree remedial actions that the tenants and PoTLL must undertake.

5.4 **Summary**

5.4.1 The measures identified above will assist in minimising the HGV traffic generation of the proposed development on the local highway network. The proposed measures are not intended to be a static list, therefore new methods or technologies which minimise HGV traffic will be investigated by the Tilbury2 Sustainable Travel Group and as part of the development of tenant and PoTLL SDPs.

SECTION 6 SUMMARY

- 6.1.1 This document has been prepared on behalf of Port of Tilbury London Limited in relation to the proposed Port development on land at Tilbury2. The note has been prepared in accordance with the policy requirements of the NPS for Ports and Thurrock Core Strategy.
- 6.1.2 The SDP identifies measures to reduce the number of HGV movements associated with the proposed development which will help reduce congestion on the local highway network and minimise pollutants associated with HGV traffic.
- 6.1.3 The tenants of the proposed development will implement measures to reduce the HGV traffic generation of the site as part of their own SDPs. These measures will include the potential implementation of processes such as backhauling, minimising empty vehicles and use of a HGV management procedures to assist with the temporal distribution of freight traffic throughout the day.
- 6.1.4 The SDP is intended to be a live document and therefore new methods and technologies to minimise the impact of HGV traffic on the local highway network will be investigated by the tenants on-site through the Tilbury2 Sustainable Travel Group and the development of their own SDPs.
- 6.1.5 The tenant and PoTLL SDPs will be coordinated with the tenant and PoTLL FTPs via the Tilbury2 Sustainable Travel Steering Group to provide a comprehensive approach to demand management for both goods and people at Tilbury2.