



Application: 20230529
Your Reference: 23/00554/FUL

TOWN AND COUNTRY PLANNING ACTS

TOWN AND COUNTRY PLANNING GENERAL REGULATIONS 1992

NO OBJECTION TO GRANT OF PERMISSION TO DEVELOP LAND

To: **THURROCK COUNCIL**
Civic Offices
New Road
Grays
Essex
RM17 6SL

TAKE NOTICE that the **GRAVESHAM BOROUGH COUNCIL**, the Local Planning Authority under the Town and Country Planning Acts, has **NO OBJECTION** for development of land situate

at **Berth 40A**
Tilbury Freeport
Tilbury
Essex
RM18 7EH

and being **Thurrock consultation - Construction and operation of a cementitious products importation, manufacture and distribution facility.**

Referred to in your application dated 17 May 2023.

GRAVESHAM BOROUGH COUNCIL HOWEVER MAKES THE FOLLOWING COMMENTS:-

1. Thurrock Council is requested to consider the below recommendations from Gravesham Borough Council:
2. The future residential development of Northfleet Riverside and Gravesend Town Centre as set out in Policy CS03 and Policy CS05 of the Gravesham Local Plan Core Strategy 2014 should be taken into account when assessing the application, particularly as environmental improvements such as air quality are specifically sought.

With regards to air quality and noise the following recommendations of the Borough Council's Environmental Protection Officer should be taken into account:
Environmental Protection commented on the original application for this proposal in July 2022. That application was granted by Thurrock Council in February 2023 and this application is for an amended scheme. The principle of the development remains the same (a cementitious product importation, manufacturing and distribution facility) but with some changes to the type of materials being imported. Granulated blast furnace slag will still be imported but instead of imported clinker for the cement manufacture, finished cement will be imported instead. It is advised that this will be a benefit in terms of eg silo size, energy consumption and that there will be no detrimental changes or impact in terms of noise or air quality which were our earlier areas of concern in terms of the

Gravesham area. The new proposal does however introduce the requirement for a large cement product storage dome at the quayside.

Having reviewed the submitted information, the following comments are made:

Noise:

Chapter 9 (Noise) of the ES submitted with the revised proposal advises that the proposed changes do not affect the operational scenarios that were assessed in the Noise Impact Assessment (NIA) submitted with the original application. In this respect, this NIA has been re-submitted with no changes.

It was commented previously that the NIA provided clear assurances that the proposed (now permitted) development and use would not result in any adverse impact at residential properties within the Gravesham borough. It was requested that monitoring is carried out to ensure that the modelling results are correct and that any adverse impacts are identified and resolved at an early stage.

This comment is re-iterated for this amended proposal.

Air Quality:

Chapter 10 of the ES covers Air Quality. Again, the ES advises that the revised scheme will not change the findings of the earlier Air quality Assessment. So, no amendments have been made and the original AQA has been re-submitted. Consequently, the comments made previously are re-iterated with regards to the construction and operational phases:

Construction Phase - Construction phase control measures will be required to mitigate dust and that with such mitigation measures there will be no offsite impact from the construction phase. It is recommended that this be secured by condition.

Operational Phase - The plant and process have been designed to ensure that the majority of the facility is enclosed with the minimal risk of dust egress from the process building. In addition, emissions from the operation will be subject to authorisation under Section 3.1 of the Schedule of the Environmental Permitting Regulations (EPR) 2016. However, this does not prevent the emissions of air pollution including fine particles eg PM2.5. The Air Quality Assessment did not cover this by way of an air quality impact assessment of the operation of the facility. It was the opinion of this service previously that one should have been prepared and submitted detailing the emissions to air of all pollutants from the facility and the impact on local air quality, and this still stands.

As this was not covered, the actual impact of the operation is unknown so it is difficult to comment on what the impact of the operation of the facility on the air quality in the borough of Gravesham will be. This is important bearing in mind the proposed new cement storage silo.

It was previously requested that a full and robust assessment of the impact of the emissions to air from the cementitious products manufacturing facility be required by condition and the impacts mitigated in full. If the LPA is not minded to require this, then it was requested that sufficient monitoring is required by condition to ensure that if there is any adverse impact on local air quality then this be addressed and resolved at an early stage. Again, this comment and request is re-iterated.

3. The Borough Council is satisfied with the level of detail and robustness of the Landscape, Townscape and Visual Impact Assessment and the conclusions made such that there would be no significant adverse impact on Gravesham Borough. It is requested that the exterior appearance of the development be considered carefully to integrate it into the surrounding environment.

Thurrock Council is thanked for consulting Gravesham Borough Council.

Dated this 31st day of May 2023

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