

Delegated Report

Adjoining Authority Consultation Application

Planning Application No: 20230529

Location: Berth 40A Tilbury Freeport Tilbury Essex

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

Applicant: THURROCK COUNCIL

Site Visit Date: N/A

Submitted Documents/Plans

Thurrock Council has submitted the following in support of the application:

Consultation letter dated 17 May 2023.

Relevant Planning History

Reference	Description	Decision	Decision Date
20220717	Thurrock Consultation - 22/00466/FUL - Construction and operation of a cementitious products manufacturing facility	Observations Sent	22.07.2022
20211337	Thurrock Consultation 21/01811/SCO - Environmental Impact Assessment Scoping pursuant to Part 4 (15) of the Town and Country Planning (Environmental Impact Assessment) Regulations 2017 in relation to a Cementitious Products Manufacturing Facility.	No objections	15.11.2021

Internal Consultations

GBC Environmental Protection

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.

Proposal

The planning application is for the importation of granulated blast furnace slag by bulk vessels and finished cement. The facility would include mills, product silos, a storage building, associated handling, processing, storage and loading areas including internal haul roads, lorry loading silos and weighbridges, and the construction of ancillary offices, workshop, and associated car parking and bike shelter.

Note: Previously it was proposed to import clinker for cement manufacture instead of finished cement.

The site of the proposed development is an existing brownfield site measuring circa 3.74 hectares (ha) situated within the Port of Tilbury, Thurrock. The proposed development will replace an existing freight handling site, which currently consists of a large warehouse building and outside stocking area.

Analysis

The Borough Council would identify air pollution, noise and visual impacts as the main issues from the Gravesham perspective. Impact will come not just from the operation of the site but also from any net change in river traffic accessing the basin.

The site is located within the centre of the existing Port of Tilbury in an area known as 'Tilbury Docks'. It is roughly 1.6 km from Northfleet Embankment East (former Northfleet Cement Works), 1.7 km from the Grove Road area, 1.7 km from Northfleet Embankment West and 2.2 km from Gravesend Town Centre. Older development in Northfleet, although further away, is located at significantly higher level than the riverside (30m OD) and therefore looks across the river towards Tilbury.

In the submitted Planning Statement, it is noted as follows:

3.3.4. Tilbury Docks is bound by the River Thames to the south. On the south side of the River Thames, opposite Tilbury Docks is Northfleet. Northfleet is characterised by industrial uses with associated jetties and wharfage...

3.3.5. Gravesend is also located south of the River Thames opposite the Tilbury passenger cruise terminal and comprises of a mixture of commercial and residential uses. The two locations are connected via a passenger ferry.

3.3.6. ... There are also residential areas to the south of the River Thames around Northfleet and Swanscombe, both over 2km away.

With regards to the nearest residential areas, it is important to note that the proposal should consider the future development of the Northfleet Riverside as set out in the Gravesham Local Plan Core Strategy 2014. In the Core Strategy there are specific policies for key sites located along the riverside:

CS03: Northfleet Embankment and Swanscombe Peninsula East Opportunity area

CS05: Gravesend Town Centre Opportunity Area

These policies include the development of these sites leading to the provision of around 980 and 330 dwellings respectively. Due attention should therefore be given to the changing nature of these areas. Policy CS03 also seeks to achieve environmental improvements to the area, especially in air quality.

Air Quality

The area of Gravesham likely to be impacted on by the cementitious products manufacturing plant is an Air Quality Management Area declared for particulate matter PM10 from aggregate sites.

Therefore, the application has been briefly considered in terms of the impact on both noise and air quality that it will have on the Borough of Gravesham.

The Planning and Environmental Statement (May 2023) Section 10 covers air quality. It refers to the construction phase, the traffic emissions and the emissions from the operation of the cementitious products manufacturing plant.

Traffic emissions - are referred to in 10.1.10 and in Technical Appendix D. These emissions will not impact this borough and therefore no further comments are made in respect of this.

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

Operational Phase – This includes the grinding of clinker and other by products and blending with gypsum, the loading and unloading of ships with cementitious materials, blending, bagging and batching of cement etc. All of which are intrinsically dusty processes.

The ES states that the plant and process has been designed to ensure that the majority of the facility is enclosed with the minimal risk of dust egress from the process building.

The ES confirms that the emissions from the operation will be subject to authorisation under Section 3.1 of the Schedule of the Environmental Permitting Regulations (EPR) 2016. Whilst this means that the activities will be subject to integrated pollution control under the EPR this regime permits installations to emit pollution within certain limits. It does not prevent the emissions of air pollution including fine particles eg PM2.5. It is therefore very disappointing that the application does not include an air quality impact assessment of the operation of the facility. It is the opinion of this service 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.

The ES states in 10.1.7 that “Considering the nature of the facility, implementation of the mitigation measures proposed and the controls that will be imposed by the EPR, it can be considered that the impact on the air quality at nearby receptors is deemed to be negligible” and in 10.1.11 that the site is self-managing in terms of dust control and as a result it is not anticipated that the proposed operation of the unit will give rise to dust nuisance.

This remains to be seen and as no air quality assessment of the operation has been carried out and the actual impact of the operation is unknown, this service is unable to comment on whether the impact of the operation of the facility on the air quality in the borough of Gravesham, is acceptable or not until such an assessment is carried out and consulted on.

It is therefore requested that a full and robust assessment of the impact of the emissions to air from the cementitious products manufacturing facility is required by condition and the impacts mitigated in full. If the LPA is not minded to require this then it is 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.

Noise

The Noise Impact Assessment and associated chapter within the ES (May 2023) have been reviewed, which provide clear assurances that the proposed developed and use would not result in any adverse impact at residential properties within the Gravesham Borough. It is 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

Visual Impacts

A Landscape, Townscape and Visual Impact Assessment (LVIA) has been carried out in respect of the proposed development.

The Landscape Character Area of Botany Marshes within Gravesham Borough is relevant to be considered, as well as the urban areas of Gravesend to the south of the River Thames, which contain a number of potentially affected listed buildings and conservation areas.

The LVIA concludes that whilst there will be a visual change from the height and lower mass structure of the proposed development, and the number of receptors of this change is high, the sensitivity of the

receptors to the type of development proposed is medium. This is as a result of the existing built landscape and the mix of surrounding residential, commercial, industrial, port and green spaces. In Gravesham, the distance of the receptors, the location of the site within the existing Port of Tilbury against similar surrounding land uses and the large scale of the River Thames visual corridor, restrict the magnitude of the effect of the proposed development to 'medium adverse'. Therefore, it is assessed that no significant adverse effects on landscape or townscape character or receptors will result from the proposed development.

The Borough Council is satisfied with the level of detail and robustness of the LVIA 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.

Recommendation

Thurrock Council is requested to consider the following recommendations from Gravesham Borough Council:

1. 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.
2. With regards to air quality and noise the recommendations of the Borough Council's Environmental Protection Officer should be taken into account: (see above Environmental Protection comments)
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.

(For detailed conditions / reasons for refusal and informatives, see draft Decision)

Case Officer:	Ms Lisa Williams	Team Leader:	Miss Faye Hobbs
Signed:		Signed:	
Dated:	31 st May 2023	Dated:	31 May 2023