

Plan ref: 20220852 Northfleet Harbourside

Port of London Authority response (DC 808):5 September 2022

Thank you for consulting the Port of London Authority (PLA) on the above request for a Scoping Opinion pursuant to Regulation 15 of the Town and Country Planning (Environmental Impact Assessment) Regulations 2017 in respect of a proposed outline planning application for a mixed use development on land Surrounding Ebbsfleet United Football Club, Bounded By Lower Road, Railway Line, Grove Road And the River Thames at 'Northfleet Harbourside', Gravesend. I have now had the opportunity to review the submitted Scoping Report and have the following comments to make.

The proposed development site encompasses the Safeguarded Robins Wharf, identified as site G in the adopted Kent Minerals and Waste Local Plan 2013-30 Early Partial Review (KMWLP) and safeguarded through policy CSM 6 (Safeguarded Wharves and Rail Depots) of the KMWLP. Policy CSM6 specifically states:

"Planning permission will not be granted for non-minerals development that may unacceptably adversely affect the operation of existing, planned or potential sites, such that their capacity or viability for minerals transportation purposes may be compromised."

Robins wharf is operational, and in use by two operators, Brett Aggregates and Aggregate Industries, who perform a vital function in the region by taking vehicle movements off roads and onto the river and is essential for the ensuring steady and adequate supply of minerals and minerals related products into/out of Kent. The PLA would therefore strongly object to any forthcoming planning application that includes the proposed loss of this safeguarded site, and it is disappointing that this wharf has not been directly referred to in the Scoping Report or any initial justification provided for the proposed loss of this vital facility.

Notwithstanding the above, it is also important to note that any development located in close proximity to a safeguarded wharf would, in line with the KMWLP and the associated Kent Safeguarding Supplementary Planning Document (SPD) (2021) need to demonstrate that all impacts including noise, dust, light and air emissions, that may arise from the activities taking place at the wharf would not be experienced to an unacceptable level by future occupants. This is particularly important as these wharves can operate over 24 hours a day in line with tidal movements and would also be in line with paragraph 187 of the National Planning Policy Framework (NPPF) (2021) which states:

"where the operation of an existing business or community facility could have a significant adverse effect on new development (including changes of use) in its vicinity, the applicant (or 'agent of change') should be required to provide suitable mitigation before the development has been completed."

This is relevant to other industrial operations that take place in this area as well as at Robins Wharf, including the seacon terminal situated directly adjacent to Robins Wharf which also utilises the River Thames for the transportation of waterborne freight via Tower Wharf. There is a reference in the noise and vibration section of the Scoping Report to operations from Tower Wharf but no reference to existing operations at Robins Wharf. In addition, in line with the KMWLP any development in close proximity to a safeguarded wharf must also ensure vehicle access to and from the wharf is not constrained. The current red line boundary, as well as including the safeguarded Robins Wharf wholly includes the access route to/from the wharf – this does not appear to have been given any initial consideration in the Scoping Report.

In summary the PLA would strongly object to any forthcoming planning application that includes the proposed loss of the safeguarded wharf at Robins Wharf. It is disappointing that there hasn't been any communication or consultation with the operators at Robins Wharf or the PLA prior to the submission of this Scoping Report and it is recommended that the applicant makes contact with all relevant stakeholders as part of this proposed development at the earliest opportunity.

I hope these comments are of assistance