

Our ref : MF/5232

27 September 2023

Mrs Katherine Parkin
Gravesham Borough Council
Civic Centre,
Windmill St,
Gravesend
DA12 1AU

Dear Mrs Parkin

Northfleet Harbourside - Land Surrounding Ebbsfleet United Football Club, Stonebridge Road, Northfleet
Application reference : 20221064

Comments on behalf of Port of Tilbury London Limited (PoTLL)

Vincent + Gorbing act for Port of Tilbury London Limited ("PoTLL") in responding to planning applications in the vicinity of the Port.

We are in receipt of your consultation letter dated 6 September 2023 and thank you for re-consulting the Port on this matter. We very much welcome Gravesham Borough Council consulting the Port on applications on the south side of the river that could impact on its operations.

We make the following comments on behalf of PoTLL as :-

- the owner and operator of the Port of Tilbury which includes land which is 'operational land' held by PoTLL in its role as a statutory undertaker; current sites including Tilbury1 (the Port's main impounded docks), and Tilbury2, a container terminal and Construction and Materials Aggregate Terminal which lies further to the east, opposite Gravesend.
- a member of the consortium of interests which successfully bid for Freeport status for the 'Thames Freeport' from the UK Government. Plans for the development of the Freeport are presently being prepared.

Port of Tilbury is a strategically vital port for the UK economy, particularly given its location on the Thames Estuary close to London. It has significant expansion plans both in the short and longer term, driven by market changes such as just-in-time delivery, and a broadening of the range of goods coming through the Port, as well as destinations served. Indeed, the importance of supporting UK ports, and Tilbury in particular, has increased now the UK has left the European Union, as new trading arrangements in Europe and around the world are forged. Port of Tilbury is now the fastest growing port in the UK, with £1billion of new investment undertaken or planned.



As noted above, PoTLL are part of a consortium of interests which successfully bid for Freeport status for the 'Thames Freeport' from the UK Government. The Freeport designation and plans will lead to intense development on land at Tilbury for port and manufacturing purposes. It is a crucial plank in Government economic policy and thus should be afforded significant weight in planning for the wider area.

Given PoTLL's current activities and immediate and longer term expansion plans, it is essential that the Northfleet Harbourside development proposals take full account of the operation of both all port activities on the north side of the river and is cognisant of the likely increase in levels of activity in the future, whether from passing or moored vessels, quayside operations, dredging or other activities on the land behind the quayside.

We note that this issue has been highlighted to the applicant by the Council and their advisers in reviewing the environmental information supplied and we welcome the Council's interrogation of this matter. We further note the applicant's response document prepared by Montagu Evans (entitled *Northfleet Harbourside, Application Ref. 20221064 Applicant Response To AY / GBC Comments 29 August 2023 – v1*) provides a commentary in this respect in terms of both shipping emissions and noise. It is also covered in a similar fashion in the Response to *Bureau Veritas Peer Review of the Environmental Statement*.

In respect of noise in particular, PoTLL remain concerned that the proposed new homes fronting the river will be in close proximity to a working river and a port terminal that operates on a 24/7 basis. Moreover, as highlighted above, the area is likely to become more intensively used for port operations in the future, with consequent increases in vessel movements. In addition, activities within the Port are always changing as the Port evolves and production practices changes.

The applicant's response states as follows :-

"The Noise and Vibration ES Chapter (ES Volume 1, Chapter 9: Noise and Vibration) undertook the following:

- Long term environmental noise monitoring; and*
- A review of existing planning conditions relating to noise emissions from Tilbury Dock.*

In order to provide a reasonable worst case scenario, the noise and vibration assessment considered the noise impact from dredging (a quarterly activity associated with the dock) and applied a 3 dB increase to future industrial noise to account for potential growth. In addition to this, a +12 dB was incorporated to include acoustic features in the assessment of noise impact on the Proposed Development.

The assessment indicated that the plots overlooking the Thames and Port of Tilbury would likely experience a "High" impact due to industrial noise and night time Dredger noise from the dock. These locations would need to incorporate specific acoustic design measures to reduce external noise intrusion sufficiently for residential uses. The indicative façade sound insulation requirements are outlined in ES Volume 1, Chapter 9: Noise and Vibration as well as potential glazing specifications (Table 9.37 of ES Volume 1, Chapter 9: Noise and Vibration). The precise measures to be adopted will need to be confirmed for each plot during their RMA.

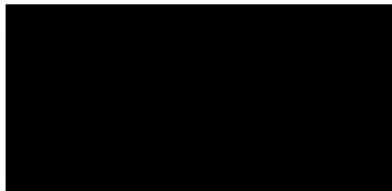


The assessments indicate that intermittent high noise levels associated with the Port of Tilbury (ie dredging) can be satisfactorily addressed through design measures. By addressing the noise from this activity will ensure that other less noisy activity will also be appropriately accounted."

We consider that the noise climate identified does bring into question the acceptability of residential properties in this location successfully co-existing with the Port's operations. Moreover, we remain concerned that this issue needs to be fully resolved now by clear and unambiguous planning conditions and detailed specifications that can be relied upon, and not left to future reserved matters applications. The acceptability of development in not restricting the 24/7 working practices at the Port now and in the future is a matter of principle as to the acceptability of the development given the Agent of Change principle and the strategic importance of the Port of Tilbury.

Should GBC consider that permission can be granted subject to planning conditions we would be grateful if GBC could consult us again when proposed conditions are prepared such that we can consult with the Port's noise consultants.

Yours sincerely



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cc John Speakman – PoTLL

