

Our ref : MF/5232

02 December 2022

Ms Genna Henry
Gravesham Borough Council
Civic Centre,
Windmill St,
Gravesend
DA12 1AU

Dear Ms Henry

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 16 November 2022 and thank you for 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 have reviewed the above planning application. 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.

We have reviewed the application documents and note that, at its closest, the site lies some 500m to the south west of the main Port of Tilbury terminal (Tilbury1). Opposite the site are a number of riverside berths, including the London Container Terminal, three wind turbines, and the Port's 'Panamax Lock' which provides access to and from the docks for visiting vessels. It is important to highlight, therefore, that a large proportion of vessels using the Port of Tilbury manoeuvre within the river in close proximity to the application site.



Existing and future port operations

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 planned.

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.

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. PoTLL foresee further port expansion in the future to the east of Tilbury² including potentially new marine infrastructure. Whilst this is not in the immediate vicinity of the application site, it is relevant to highlight that the level of use of commercial use of the Thames in this location is set to increase in coming years.

Policy Context

The National Policy Statement for Ports (NPS) already sets out a presumption in favour of Port development in the cases where port development falls under the auspices of the Planning Act 2008. That policy is in turn a material consideration in decisions under the TCPA planning regime¹. The NPS sets out a presumption in favour of port development.

Of further relevance is the 'Agent of Change' principle as set out in paragraph 187 of the NPPF which requires that planning decisions ensure that new development can be integrated effectively with existing businesses and that such business should not have unreasonable restrictions placed on them as a result of development permitted after they have been established.

¹ Revised National Planning Policy Framework (July 2021) Para 5: "National policy statements form part of the overall framework of national planning policy, and may be a material consideration in preparing plans and making decisions on planning applications."



Specific comments on the planning application

PoTLL does not object in principle to the redevelopment of the site, although we consider that, in general, the application appears to make little reference to the Port (there is no mention at all of the proximity of the Port in the Planning Statement, for example).

However, it is noted that the planning application proposes a series of tall residential buildings close to the river and therefore a large number of apartments with balconies and opening windows with views towards the river and the Port on the north side of the river. It must therefore be understood that new homes in this area 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. A key element in this is an increase in 'value added' activities at the Port. As an example, a proposed cementitious products manufacturing facility within Tilbury1 is presently the subject of a planning application submitted to Thurrock Council (reference 22/00466/FUL)

It is fundamental to both port operations and the amenity of future residents that the activities of the Port are fully taken into account in the design and specification of the new homes, particularly in respect of aspects such as air quality, noise and lighting.

With particular reference to noise, we note that noise from dredging and the Port's wind turbines have been taken into account but it unclear as to how intermittent vessel movements have been factored into the assessment. We note that the outcome of the assessment is significant adverse impacts on some plots close to the river at night which will need to be addressed by planning conditions in respect of glazing and the design of balconies.

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

