

20221064 Northfleet Harbourside

Further to the MMO's standard response from the Marine Planning team to the above planning application sent on 18<sup>th</sup> November 2022, I write with further detail relating to this application with regard to the South East Inshore Marine Plan.

### **Marine Management Organisation 12 December 2022**

The submitted Minerals Infrastructure Assessment on Northfleet Harbourside has drawn out the relevant policies from the Kent Minerals and Waste Local Plan 2013-2030, however it is noted the South East Inshore Marine Plan is not referred to. Relevant wording within the South East Inshore Marine Plan and policy SE-INF-2 mirror similar provision in terrestrial planning and supports the continued operation of existing landing facilities. With regard to safeguarding, the South East Inshore Marine Plan Technical Annex (which contains specific policy detail) makes direct reference to regional and county minerals and waste plans (in this case the Kent Minerals and Local Plan) as below;

*52. Outside of London, landing facilities are safeguarded through regional and county minerals and waste plans. These sites remain safeguarded until the relevant safeguarding direction (or mineral and waste plans) are formally removed or amended.*

As noted in the Minerals Infrastructure Assessment, the site is specifically safeguarded within the Kent Minerals and Waste Local Plan (and remains so in the Draft Kent Minerals and Waste Plan 2023-3038 currently under review and consultation). Within the South East Inshore Marine Plan Technical Annex, policy SE-INF-2 (1) states that alternative development at existing safeguarded landing facilities will not be supported, and Figure 4 on pg97 shows safeguarded landing facilities in the South East Inshore Marine Plan area related to 1) and 2) of SE-INF-2. At the time of publication, this safeguarding data is from relevant legislation and the Kent Minerals and Waste Local Plan. The South East Inshore Marine Plan does not decide or amend these site designations. Proponents should refer to the original legislation for detailed delineated site boundaries and relevant statutory local plan guidance. It is worth noting that the Technical Annex details the nearby Northfleet Wharf (pg43, pt94) as an example of a safeguarded landing facility but that does not mean Robins Wharf is excluded or not relevant here and as already mentioned is specifically safeguarded in the Kent Minerals and Waste Local Plan (as per pt52 above).

Please find a link to the South East Marine Plan and South East Marine Plan Technical Annex.

<https://www.gov.uk/government/publications/the-south-east-marine-plan-documents>

We are not able to specifically comment on capacity being offset elsewhere, however this document produced by the Mineral Products Association suggests a growing need for marine aggregate imports to support the overall construction aggregate supply by 2035.

[https://www.mineralproducts.org/MPA/media/root/Publications/2022/Aggregates\\_demand\\_and\\_supply\\_in\\_GB\\_Scenarios\\_for\\_2035.pdf](https://www.mineralproducts.org/MPA/media/root/Publications/2022/Aggregates_demand_and_supply_in_GB_Scenarios_for_2035.pdf) .