



NOADJZ

Application: 20220717
Your Reference: 22/00466/FUL

TOWN AND COUNTRY PLANNING ACTS

TOWN AND COUNTRY PLANNING GENERAL REGULATIONS 1992

NO OBJECTION TO GRANT OF PERMISSION TO DEVELOP LAND

To: **Thurrock Council**
Civic Offices
New Road
Grays
Essex
RM17 6SL

TAKE NOTICE that the **GRAVESHAM BOROUGH COUNCIL**, the Local Planning Authority under the Town and Country Planning Acts, has **NO OBJECTION** for development of land situate

at **Berth 40A**
Tilbury Freeport
Tilbury
Essex
RM18 7EH

and being **Thurrock Consultation - 22/00466/FUL - Construction and operation of a cementitious products manufacturing facility**

Referred to in your application dated 23 June 2022.

GRAVESHAM BOROUGH COUNCIL HOWEVER MAKES THE FOLLOWING COMMENTS:-

Thurrock Council is requested to consider the below 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 following recommendations of the Borough Council's Environmental Protection Officer should be taken into account:

This site is on the north side of the Thames River located opposite to areas of both residential in nature and mixed use with a considerable amount of development and regeneration occurring in the future bringing in more residential uses.

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 following reports have been considered in brief:

Environmental Statement March 2022

Assessment of Traffic Related Air Quality Impact Report - February 2022

Assessment of Potential Noise Impact Report - March 2022

Air Quality comments:

The ES (March 2022) 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 10.1.3 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 offsite impact from the construction phase. It is recommended that this be secured by condition.

Operational Phase - This includes the grinding of clinker, 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 10.2.8 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 10.3.1 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 there 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 comments:

The Noise Impact Assessment and associated chapter within the ES (March 2022) 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.

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.

Thurrock Council is thanked for consulting Gravesham Borough Council.

Dated this 22nd day of July 2022

Address; Civic Centre
Windmill Street
Gravesend
Kent
DA12 1AU



Gravesham Borough Council