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NORTHFLEET CENTRAL 1 LIMITED

ROBINS WHARF, NORTHFLEET

MINERALS INFRASTRUCTURE ASSESSMENT - UPDATE

AUGUST 2023

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AUGUST 2023

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APPENDICES

Appendix 1:

DRAWINGS TITLE

ST19719 – 001 Robins Wharf

ST19719 – 002 Robins Wharf relative to planning redline boundary

ST19719 - 003 Minerals Infrastructure Safeguarding Plan (Kent Minerals and Waste Local Plan 2021-2030)

ST19719 - 004 Safeguarded Wharves in proximity to Robins Wharf (Kent Minerals and Waste Local Plan 2021-2030)

1 INTRODUCTION

- 1.1.1 This report has been prepared in accordance with instructions from Northfleet Central 1 Limited in the context of a planning application that has been submitted to Gravesham Borough Council (Ref. 20221064) for a proposed major mixed-use development on land at Northfleet, Swanscombe, Kent. Wardell Armstrong has previously prepared a Minerals Infrastructure Assessment (MIA) in support of the planning application. The application site boundary is identified at Drawing ST19719-001.
- 1.1.2 As part of the planning application process, responses have been received from statutory consultees and interested parties. These have been in respect of the overall proposals, but also specifically with regards to concerns over loss of the eastern-most element of the site which includes Robins Wharf. The wharf and associated land comprise of around 3.85 hectares in area leading up to the edge of the River Thames (the overall application area is c.19 hectares). We provide greater detail below on the context and existing function of the wharf.
- 1.1.3 It was previously outlined and agreed that the initial MIA would not address minerals safeguarding given the urban nature of the site (this is addressed separately in the planning statement submitted as part of this application). The focus of this assessment is therefore on the proposed loss of the wharf and its functionality. As the wharf has been safeguarded by Kent County Council in its adopted Minerals & Waste Local Plan 2013-30, it is against these Policies and other materials considerations that any assessment should be made. This report seeks to address those specific concerns and provide further justification in respect of loss of the existing functionality of the wharf.
- 1.1.4 The application site comprises part of a wharf that has been safeguarded in the Kent Minerals and Waste Local Plan, known as Robins Wharf, and associated readymix concrete and asphalt plants. Where added value plants such as readymix concrete plants and asphalt plants are located in a safeguarded wharf, those plants are also afforded the protection of safeguarding during the life of the safeguarded host facility.
- 1.1.5 As previously indicated in the Minerals Infrastructure Assessment, Kent County Council has confirmed during pre-application discussions with the developer that a Minerals Resource Assessment is not required. Given the current urban nature of the proposed development site, safeguarded minerals have been addressed in the

Planning Statement rather than in a separate report on the basis that the site's location within the designated Urban Area nullifies the designation. Consequently, the scope of this report is limited to a mineral infrastructure assessment only.

1.2 Site Location

- 1.2.1 The site is located approximately 1.5km north-east of Swanscombe. The site consists of c.19 ha including Robins Wharf at its eastern edge. The application (red line) boundary includes land to the wharf edge but excludes the water-borne elements including part of the landing crane and landing stage.
- 1.2.2 The site is shown on drawing ST19719 – 002. Existing access to Robins Wharf is via Grove Road off the A226 London Road.
- 1.2.3 The area of the site that this report focusses on comprises of the wharf (with jetty extending into the Thames), receptor/ open storage areas for materials and processing/ bagging areas. The materials receiving area for water-borne deliveries, is confined to the front part of the wharf.

1.3 Proposed Development Site in Relation to Robins Wharf

- 1.3.1 The proposed development site is bound to the north-west by Lower Road and the Northfleet Industrial Estate and to the south-east by Grove Road. To the south, the site straddles the A266 and is bounded by the railway (as shown on drawing ST19719 – 001). To the north, the boundary extends to the River Thames and includes Robins Wharf. The wharf and associated operational areas extend to approximately 3.85 ha of the total application site area. Adjacent to the wharf is Robins Creek and Northfleet Harbour.

1.4 Description of Development

- 1.4.1 The proposed development is submitted in outline with all matters reserved (apart from access into and out of the site) to allow the demolition of all existing buildings and structures and the phased construction of a mixed use development comprising residential units, a hotel, a new football stadium with associated business and leisure facilities, a range of commercial, business and service uses including retail and food and beverage uses, community uses and a range of sui generis uses, with associated public realm and hard and soft landscaping, highways works, car parking, access and servicing arrangements, infrastructure and ancillary works and associated works.

2 PRINCIPAL MINERAL INFRASTRUCTURE ISSUES AS PER OBJECTIONS

2.1.1 It is acknowledged that various objections and comments have been received in relation to the proposed mix-use development in respect of loss of the wharf. The development would involve the demolition of all buildings and structures within the redline boundary (drawing ST19719 – 001) including the loss of operations concerned with the safeguarded wharf and all of the associated minerals related activity, readymix concrete and asphalt plants. The wharf's landing stage is not within the red line and therefore it is unclear on whether this will be retained although the current function would clearly be redundant.

2.1.2 A summary of the main concerns which relate to the loss of the wharf is provided below:

- Whether the proposed development complies with the requirements of the adopted Minerals Strategy in the Kent Minerals and Waste Local Plan (KMWLP) particularly Policy DM8;
- Whether the proposed development complies with the requirements of the National Planning Policy Framework;
- Whether the proposed development complies with the requirements of the Gravesham Local Plan and the allocations for strategic development;
- Whether the proposed development complies with the policies of the South East Inshore Marine Plan as this was not referred to;
- Whether sufficient evidence has been provided to justify the loss of Robins Wharf; and
- That certain assertions are out of date due to an earlier version of the Local Aggregates Assessment being used;

2.1.3 Ultimately, the decision of whether the loss of Robins Wharf and its associated infrastructure is acceptable is planning-policy based. As such, it is essential in this report to identify relevant mineral infrastructure related planning policies and guidance and to appraise the potential loss of Robins Wharf against them. Again, matters of planning balance are detailed elsewhere in the planning submission outside of this report.

3 SITE HISTORY

3.1 Historical Use

- 3.1.1 As indicated elsewhere in this application, within the Heritage Chapter and Heritage Statement, the use of the site as a wharf is historic, with the pier elements being introduced into the channel in the late Victorian era. The site was use as part of a broader Portland cement operation which included a large cement works and associated infrastructure. In the early part of the 20th Century, the site was rail-linked with trackways leading to and from the wharf, linking to the railway to the west.
- 3.1.2 Those tracks have long since been removed from the site and the potential for connection to the railway has been severed by intervening development and highways infrastructure. In general, the area changed to includes various structures and buildings of varying scale in what become a more commercial/ industrial area with land-based activities (car garages, depots, offices etc) becoming more prevalent.
- 3.1.3 Robins Wharf has continued to function as an importing point for materials, including marine-dredged sands and gravels.

3.2 Current Mineral Operators

- 3.2.1 Robins Wharf is occupied by Brett Aggregates and Aggregate Industries. For the purpose of this report both parties shall be referred to jointly as the “Operator”. The wharf is a shared facility jointly used by the Operator for the importation of aggregates for direct sale or supply into added value products. At this location the Operator’s tenants, CPI Mortars and North Kent Roadstone, produce readymix concrete and asphalt for sale into local markets.
- 3.2.2 Much of the c.3.8 ha of Robins Wharf is given over to the storage and processing of the materials. The wharf is relatively limited in size at around 100 metres.

4 SITE DESCRIPTION

4.1 Mineral Operators

4.1.1 Robins Wharf is occupied by Brett Aggregates and Aggregate Industries. For the purpose of this report both parties shall be referred to jointly as the “Operator”. The wharf is a shared facility jointly used by the Operator for the importation of aggregates for direct sale or supply into added value products. At this location the Operator’s tenants, CPI Mortars and North Kent Roadstone, produce readymix concrete and asphalt for sale into local markets.

4.1.2 Aggregates, concrete and asphalt are transported to the end user by Heavy Goods Vehicles which utilise the local and strategic road network to arrive at their location.

4.2 Wharf Throughput and Capacity

4.2.1 Kent County Council’s Local Aggregate Assessment 2022 confirms that the County has a total of 12 safeguarded wharves (drawing ST19719 – 003) under Policy CSM6 of the Kent Minerals and Waste Local Plan 2013-2030, of which 9 are active/semi active. Policy CSM6 of the local plan lists 12 safeguarded wharves alongside rail depots (we detail the Policy later in this report). It is noted that an importance is placed on safeguarding wharves given the decreasing reliance on land-won sharp sands and gravels.

4.2.2 Data obtained from the Port of London Authority Terminal Maps (see Table 1 below) indicates that all wharves in proximity to Robins Wharf (see drawing ST19719 – 004) have similar characteristics in terms of the number of available berths, between 1 and 2, access to the surrounding highway and motorway network. Robins Wharf is one of smaller wharves with a length of 100m. The other wharves range in length from 149m to 298m. We note that wharves further along the Thames may be less than 150m as a general rule.

4.2.3 Wharf capacity in adjoining Counties falls outside the scope of this assessment which relates purely to wharf capacity in Kent as this is considered to be the most appropriate basis for Policy assessment (the policy relates to safeguarded ports in Kent). However, it should be noted that there are also minerals wharves elsewhere on the Thames, in Essex and certain London Boroughs. Kent wharves are also located on the Channel coast (e.g. Ramsgate) and along the Medway Estuary. This is an indication that there are a number of other opportunities for any increase in throughput

particularly from marine-based aggregates without reliance on Kent wharves or on the Northfleet stretch alone.

Wharf	Berths	Length	Depth of Water (MHWS)	Access	Material
Robins Wharf	1	100m	9.01m	A2/M25	Aggregates
Northfleet Wharf	1	100m	10.21m	A2/M2/M25	Aggregates (sand, gravel and marine)
42 North Terminal	1	298m	16.06	A2/M25	Bulk Powder & Cement
Clubb's Marine Terminal	2	100m	11.41	A2/M2/M25	Aggregates (marine)
Johnson's wharf	1	n/a	11.16m	A2/M2/M25	Aggregates (marine)
North Sea Terminal	1	149m	11.4m	A2/M2/M25	Aggregates (marine)
Red Lion Wharf	1	240m	14.06m	A2/M25	Aggregates & Type 1
Tower Wharf	2	200m	17.61m	M25	All products. Aggregates not specified.

Table 1. Wharf characteristics in proximity to Robins Wharf (source Port of London Authority Terminal Maps)

- 4.2.4 The MIA previously estimated that the throughput for Robins Wharf was c.284,848 tonnes based on an estimated proportion of total throughput of 712,121 tonnes at the Northfleet wharves. This figure was derived from published data within the "Marine Aggregates, The Crown Estate Licences Summary of Statistics 2021". That report was updated in 2022 and provides information on the regional landing statistics via wharves, broken down by region, county and individual wharf (it groups the Northfleet wharves together - Northfleet, Robins Wharf and Brett Northfleet).
- 4.2.5 The report states that in 2022 Kent imported 1,747,263 tonnes of marine aggregate via its wharves (this is a slight increase on the 1,694,537 tonnes in 2021). Northfleet has also seen a slight increase in tonnages from 712,121 tonnes in 2021 to 757,895 tonnes in 2022. Based on the previous estimate, the throughput at Robins Wharf is considered to be 303,158 tonnes. It should be noted that this throughput is part of a much wider throughput for the Thames Estuary as a whole, which is stated as being 7.89mt. This includes 1.5mt at Cliffe (in Kent), 2.1mt at Dagenham and 1.9mt through the Greenwich Wharves.
- 4.2.6 The LAA 2022 indicates that Kent's wharf capacity 'remains substantial' with the total capacity for aggregate importation per annum at 5.6 million tonnes in 2020 increasing to 6.34mt in 2021. It then states that the theoretical capacity is recorded at 7.3 million tonnes. The report indicates that Kent's wharves were operating at 61% capacity rising in 2021 (this was previously recorded as 54% in the previous LAA).

- 4.2.7 The report states that, “Kent still has significant unused capacity in its wharfage, as it is operating at approximately 60% capacity at the end of 2021 (leaving 40% headroom). However, loss of any wharf site will be, largely, irreplaceable and so others will need to increase their throughputs.” The report indicates that there is a need to safeguard wharves as, *“Difficulties such as shipping availability, navigation maintenance, facility repair and renewal considerations all could combine to exert stress on a wharf importation system trying to operate at a higher rate”*. This importance in safeguarding is acknowledged, but the assertion is that the existing facilities would not be able to increase due to limitations on infrastructure. It is our understanding that the trend in terms of shipping, for instance, will be a move to larger vessels to increase efficiency. An example of this is the Hanson Thames, which is a brand new marine aggregates dredger that is 103.5 metres in length with a published draught of 5 metres (assumed unladen).
- 4.2.8 The two aggregates companies that comprise the Operator at Robins Wharf have other operations in Kent and the wider Thames Estuary. It is understood that there is capacity at these other safeguarded locations including in Kent. Table 2 lists the safeguarded wharves and the operators. Brett Aggregates operates from 4 out of 12 of the safeguarded wharves, Aggregate Industries from 2.

Wharf Name	Operator
Ridham Dock	Brett and Tarmac
Johnsons Wharf	Lafarge
Robins Wharf	Aggregate Industries and Brett
Clubbs Marine Terminal	Clubb
East Quay, Whitstable	Brett
Red Lion Wharf	Stema Shipping
Ramsgate Port	Brett
Dunkirk Jetty, Weston Docks	Brett
Wharf 42	Lafarge
Northfleet Wharf	CEMEX
Sheerness	Aggregate Industries
Old Sun Wharf*	Fleetmix Ltd.

Table 2. Safeguarded Wharves and Operators (Kent Minerals and Waste Local Plan 2013 to 2030). *Old Sun Wharf – unable to locate any information via Port of London Authority

- 4.2.9 It was previously asserted that Robins Wharf is at a slight disadvantage over neighbouring wharves in terms of length and depth of water, mean high water springs (MHWS). As indicated above, it has one of the shorter lengths and shallowest MHWS.

We note from the Port of London response that they hold data on vessels visiting the dock and as part of this assessment, we do not claim to be experts in tidal patterns and berthing limitations. Our previous assertions were simply that, when compared with other wharves in the vicinity and the wider Thames Estuary, there are better equipped wharves that are capable of accommodating larger vessels on a more frequent basis (we comment on this later in the report).

5 MINERALS PRODUCTION

5.1 Source

5.1.1 Kent has demand for soft sand, sharp sand and gravel and hard rock. The latest data is provided by the Kent County Council's Local Aggregate Assessment 2022.

5.1.2 These materials are supplied from land-won and marine-won sources or imported by road or via wharves and railheads. There are two hard rock quarries in Kent and a number of sharp sand and soft sand quarries.

5.2 Supply

5.2.1 The Local Aggregate Assessment 2022 provides the most recent data on the County's demand for and the supply of aggregates. The report states that demand for aggregates is met from both imported aggregate (rail and marine) and land-won sources within the County.

5.2.2 The general trend indicates increases in the import of sharp sands & gravel and crushed hard rock (via wharves) and a general decrease in landwon material. The tonnages of material produced in Kent are significantly dependant on importation of material.

Figure 11: Total Primary Aggregate Production in Kent during 2012-2021 (tonnes)

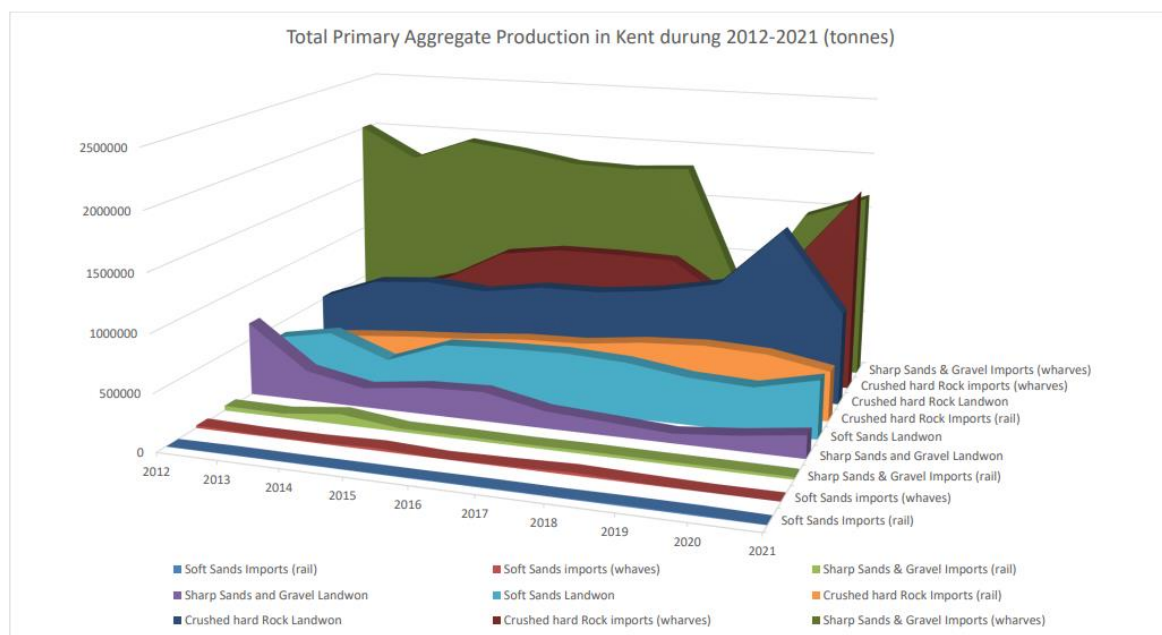


Figure 1 Total Primary Aggregate Production in Kent during 2012-2021 (tonnes) (KCC LAA 2022)

5.2.3 The LAA 2022 states that the trends may be linked to,

“The economic uncertainty caused by the UK’s exit from the European Union (EU) may explain why in 2019 aggregate importation and the utilisation of recycled and secondary aggregates experienced contraction. This appears to be reversing given the 2020 and 2021 sales data. Landwon soft sand sales also experienced contraction, but of a lower degree of magnitude, and are now showing some recovery. The landwon sales of crushed rock, for the reasons given above, were the beneficiary of very local circumstances in Kent, and have returned to a more historical level of sales” (p46).

5.2.4 Whilst it has been questioned in the letters of objections whether the assertion in the MIA that there is capacity that can be utilised, can be substantiated, the latest LAA is clear that there is **substantial** capacity and that the need for safeguarding of wharves relates more to concerns over the capacity for the existing infrastructure to handle increases in throughput.

5.2.5 It remains our assertion that between Kent’s 9 active/semi active (a total of 12 safeguarded wharves under Policy CSM 6) there is sufficient capacity within the County to absorb aggregate imports of c.304,000 tonnes which would result from the loss of Robins Wharf.

5.2.6 At current rates of importation via wharves there is surplus capacity to land aggregates of between 2.57 to 3.36 million tonnes (Table 3).

10-Year Production (excludes recycled aggregate)	Aggregate (excludes recycled aggregate)	10-Year Average import via Wharves: Crushed Rock, Sand and Gravel*	Kent’s Wharf Capacity (million tpa)	Surplus Wharf Capacity (million tpa) at 61% Capacity
4,734,210		3,180,000	6.34 to 7.3 Mt	2.47 to 2.85 Mt

Table 3. Kent’s 10-Year average Aggregate Production in tonnes, importation via Wharves, Wharf Capacity and Surplus Capacity. *Note: the figures do not include imports of cement

5.3 Future Trends

5.3.1 The LAA 2022 identifies that there is future planned housing and infrastructure growth in Kent (excluding Medway) that will drive demand for aggregates. It does caveat that there is not a direct relationship in one Minerals Planning Authority between sales of materials and construction, but this can provide an indication of future growth demands and need for minerals production. The most recent Housing LED Forecast 2021 (Kent Analytics, Kent County Council) predicts the between 2020-40 190,398 homes will be required. It indicates that this represents a fall-off of housing

requirements based on analysis of the demographic data from the Office of National Statistics (ONS). It notes that, in addition, Ebbsfleet Garden City exists within Kent which is a planned development of up to 15,000 homes and 45,000m² of commercial floor space.

- 5.3.2 It is noted that there are a number of other significant developments currently being considered within the planning system, many of which will be incorporated within the above forecasts.
- 5.3.3 Marine won aggregates continue to form a key part of supply across the UK, but certainly in the Thames Estuary region including Kent. A report produced by The Crown Estate and the British Marine Aggregate Producers Association titled “The area involved – 24th annual report - Marine aggregate extraction 2021” identifies areas of dredging and tonnages and the relevance of this by identified region.
- 5.3.4 The Thames Estuary relates to dredging in a licensed area of c.130 km². 85.7% (1.37 mt) was delivered to the Thames Estuary from the licensed area with 9% delivered to mainland Europe and the remainder to south and east coastal areas.

5.4 **Potential Limitations of Future Use**

- 5.4.1 There is an indication of future increase in requirements for marine won aggregates to meet Kent and the wider Thames Estuary requirements. There has been a move to larger dredging vessels to meet the increased demand. An example of this is the Hanson Thames, which is a brand new marine aggregates dredger that is 103.5 metres in length. The vessel has a draught of 5 metres. The increased size of dredger will create limitations on those smaller wharves that will not be able to accommodate the length. The depth of water will also be crucial to accommodate berthing of the vessels. We note comments from the Port of London that certain larger vessels have been recorded at Robins Wharf and do not claim to be experts in this regard. Our assertion is that there are other, better equipped wharves in Kent.
- 5.4.2 Robins Wharf is limited in its length (c.100m) and the channel depths adjacent to the jetty. There would potentially be a pressure on a need for a further extension to the jetty into the main channel of the Thames, which may not be possible at this point on the river. It may also not be feasible. We note the concerns here in the LAA on the capability of older infrastructure being able to increase productivity.
- 5.4.3 In addition it is not clear whether the current throughput could be increased and indeed whether any increase would materially enhance the wharf and meet the more

macro import/ construction requirements across the Estuary region. It is likely that increases can be met by the larger wharves elsewhere.

- 5.4.4 There has also been a comment made in respect of sustainability. It is not clear what the specific point being made means, as all marine won material will be brought from the channel into the estuary. Where it is landed is less relevant. The key is how the material is then transported from the wharf. An increase in throughput will mean an increase in landside vehicle movements. Whether this is from Robins Wharf or if these movements are displaced to other wharves is immaterial. Further we would assert that if there is an increase in throughput, that this should be directed to those facilities that have rail linked capabilities or where processed material could be shipped elsewhere.

6 MINERALS INFRASTRUCTURE GUIDANCE AND POLICY

6.1.1 As mentioned in Section 5 of this report, the decision as to whether the loss of Robins Wharf would be acceptable will be guided by National and Local planning policies and other relevant material considerations. All relevant policies relating to minerals infrastructure for this development/ site are outlined in full below.

6.2 National Planning Policy Framework (NPPF) (adopted July 2021)

6.2.1 The National Planning Policy Framework sets out government's planning policies for England and how these are expected to be applied.

6.2.2 Paragraph 210 (e) of the NPPF states that planning policies should safeguard existing, planned and potential sites for: the bulk transport, handling and processing of minerals; the manufacture of concrete and concrete products; and the handling, processing and distribution of substitute, recycled and secondary aggregate material.

6.3 Gravesham Local Development Plan

6.3.1 The Development Plan for Gravesham currently consists of:

- Gravesham Local Plan Core Strategy and Local Plan Policies Map (2014)
- Gravesham Local Plan First Review (1994) – saved Policies
- Kent County Council Minerals and Waste Local Plan 2013-30 (2020)

6.3.2 Although its not part of the adopted development plan, Gravesham Borough Council also takes account of the South East Marine Plan policies when determining planning applications that fall within the marine plan area.

Gravesham Local Plan Core Strategy (adopted September 2014)

6.3.3 The Local Plan Core Strategy is the main document in the Gravesham Local Plan. Its role is to:

- Set out a long-term vision for the future of Gravesham based on evidence of need to support communities and outline what makes Gravesham a distinctive and attractive place to live and work;
- support and inform; sustainable development via investment in infrastructure, economic development, and regeneration proposals within the borough, while promoting healthy communities;
- provide a consistent basis for planning application decisions.

6.3.4 Policies of relevance from the Core Strategy include:

Policy CS03 - Northfleet Embankment and Swanscombe Peninsula East Opportunity Area

The Northfleet Embankment and Swanscombe Peninsula East Opportunity Area is a substantial opportunity for major riverside regeneration in Gravesham. Development will bring significant benefits to existing adjoining residential communities and the Borough as a whole through the delivery of new housing and jobs whilst achieving environmental improvement, especially in air quality, and a high standard of design.

Any future proposals for the Swanscombe Peninsula East Undeveloped Area will be subject to a comprehensive masterplan approach which deals with the issues of flood risk, transport and access, ground conditions, proximity to existing industrial uses, air quality, biodiversity, utilities, navigation and the presence of the HS1 railway line.

The Swanscombe Peninsula East Riverside Industrial Area, Kimberly Clark Site and Imperial Business Estate will be retained in employment use. The Council will support proposals which expand and support their operation.

The Council will support the regeneration for residential and employment uses of the Grove Road and Lower Ebbsfleet Area taking into account the ground conditions and existing uses.

Development of the Key Sites will lead to the provision of around 980 dwellings and around 133,500 sq m gross employment floorspace. Development on the Key Sites will be in accordance with the principles set out below.

Land East of Grove Road and Robin's Creek Key Site (within sub-area 1.3)

This will provide a residentially led mixed use development with the potential to create around 200 dwellings. Such development will be expected to: improve and enhance Robin's Creek and the Ebbsfleet stream; improve greenspace; and reduce heavy commercial traffic and parking on Grove Road.

6.3.5 The loss of existing commercial wharves shown on the Policies Map and other land-side supporting infrastructure will not be supported unless a study and supporting evidence shows that they are no longer viable for marine related employment

purposes or are incapable of being made so at reasonable cost, and it has been shown that there is no demand for them through an appropriate marketing exercise carried out in accordance with Council guidance, or appropriate alternative provision is available or will be provided as part of the rationalisation of facilities that, as a minimum, maintains capacity and provides equivalent or better facilities.

- 6.3.6 The Gravesham Local Plan Core Strategy outlines how the Grove Road and Lower Ebbsfleet Area (sub-area 1.3), within which Robins Wharf is located, consists of a number of separate sites that have regeneration potential. Paragraph 4.4.7 of the Core Strategy recognises the potential for residential-led regeneration to complement the proposal to extend the existing residential development in sub-area 1.4 and this is identified a key site. Initial estimates suggest that this area could deliver around 200 new homes. Such development would be expected to: improve and enhance Robin's Creek and the Ebbsfleet stream; improve the greening of this area; and reduce the heavy commercial traffic and parking on Grove Road.

Policy CS07: Economy, Employment and Skills

In conjunction with the private sector and its regeneration partners, the Council will seek to secure the delivery of around 186,490 sq m gross new employment floorspace over the plan period focusing on the following:

- a major new B1/office employment centre as part of a wider mixed use sustainable development of Ebbsfleet;
- office, industrial and warehousing facilities on Key Sites in the Swanscombe Peninsula and Northfleet Embankment Opportunity Area;
- office development in Gravesend Town Centre as well as retail, culture and leisure (see Policy CS05);
- office, industrial and warehousing development on Key Sites in the Gravesend Riverside East and North East Gravesend Opportunity Area; and
- office and light industrial development in the form of an enterprise centre/incubation space on greenfield land South of Coldharbour Road, Northfleet.

Proposed office development, in addition to that allocated elsewhere within this plan, will be directed in the first instance to Gravesend Town Centre, and then to edge of centre locations, including sites within 500 metres walking distance of

Gravesend Railway Station and Ebbsfleet Station, in accordance with the NPPF sequential test. Only if suitable sites are unavailable in these locations, will consideration be given to out of centre locations.

Proposals for office development exceeding 2,500 sq m floorspace which lie outside Gravesend Town Centre and are not identified elsewhere in this Core Strategy, will be subject to an impact assessment in line with the NPPF.

The Council will work with its partners and landowners at Swanscombe Peninsula East to deliver additional employment-led mixed use development subject to a comprehensive masterplan approach.

In considering development proposals, particular support will be given to schemes incorporating small and flexible industrial and/or office workspaces of high quality intended to support the start-up and expansion of small and medium sized enterprises. The Council will also support the refurbishment and upgrading of existing industrial and commercial premises and improvements in information and communications technology to facilitate more flexible working practices and the changing economic needs of the Borough.

Development resulting in the loss of B class employment floorspace will not be supported unless otherwise allowed for by policies set out in the Core Strategy or where:

- the proposal will deliver at least an equivalent number of new jobs on-site or elsewhere within the Borough and the proposed use is consistent with other policies set out in this plan; or
- the existing premises are no longer suited for employment purposes or are incapable of being made suitable at reasonable cost and it has been shown that there is no demand for them through an appropriate marketing exercise carried out in accordance with Council guidance (Appendix 5); or
- the existing premises have an unacceptable environmental impact on the area within which they are situated and this is incapable of reasonable mitigation or the environmental benefit that would arise from the existing use stopping would outweigh the potential loss in employment.

Development proposals facilitating the expansion of river-related employment will be supported, particularly where these involve the use of the river for transport

and/or provide specialist training or other facilities intended to support the continued use of the River Thames as a major commercial waterway.

The loss of existing commercial wharves shown on the Policies Map and other land-side supporting infrastructure will not be supported unless a study and supporting evidence shows that they are no longer viable for marine related employment purposes or are incapable of being made so at reasonable cost, and it has been shown that there is no demand for them through an appropriate marketing exercise carried out in accordance with Council guidance (Appendix 5), or appropriate alternative provision is available or will be provided as part of the rationalisation of facilities that, as a minimum, maintains capacity and provides equivalent or better facilities.

The Council will support proposals that promote the appropriate expansion and diversification of the rural area economy. Support will be given to the conversion of rural buildings to employment use/live-work units where it is compatible with national policies for protecting the Green Belt and where it accords with policies in this plan, in particular relating to Green Infrastructure.

The Council will work with its regeneration partners to enhance opportunities for all local people to access the greater range of higher skilled jobs that will arise as a result of the policies above. Support will be given to upgrading educational and training facilities and major development projects will be expected to contribute (either directly or through other agencies) towards the delivery of skills training, the promotion of apprenticeships and work placements.

6.3.7 The loss of existing commercial wharves shown on the Policies Map and other land-side supporting infrastructure will not be supported unless a study and supporting evidence shows that they are no longer viable for marine related employment purposes or are incapable of being made so at reasonable cost, and it has been shown that there is no demand for them through an appropriate marketing exercise carried out in accordance with Council guidance (Appendix 5), or appropriate alternative provision is available or will be provided as part of the rationalisation of facilities that, as a minimum, maintains capacity and provides equivalent or better facilities.

6.3.8 The Council will support proposals that promote the appropriate expansion and diversification of the rural area economy. Support will be given to the conversion of rural buildings to employment use/live-work units where it is compatible with national

policies for protecting the Green Belt and where it accords with policies in this plan, in particular relating to Green Infrastructure.

- 6.3.9 The Council will work with its regeneration partners to enhance opportunities for all local people to access the greater range of higher skilled jobs that will arise as a result of the policies above. Support will be given to upgrading educational and training facilities and major development projects will be expected to contribute (either directly or through other agencies) towards the delivery of skills training, the promotion of apprenticeships and work placements.

Policy CS11: Transport

New developments should mitigate their impact on the highway and public transport networks as required. As appropriate, transport assessments and travel plans should be provided and implemented to ensure the delivery of travel choice and sustainable opportunities for travel. Transport assessment work is required to be undertaken in accordance with national and local policy guidance, and to identify detailed highway and public transport network requirements and management arising from the development.

Sufficient parking in new development will be provided in accordance with adopted parking standards which will reflect the availability of alternative means of transport and accessibility to services and facilities.

The Council will support proposals which improve public transport provision and facilities in the Borough. In particular, it will:

- seek to maintain and expand, where justified, segregation lanes for Fastrack and existing bus priority measures elsewhere;
- require Key Sites to include provision for buses;
- support the development of transport hubs at Gravesend Town Centre and Ebbsfleet (in Dartford Borough Council area) to provide high quality interchange facilities between bus, rail, walking and cycling; and
- Ensure an adequate supply of public car parking.

The Council will seek improvements to walking and cycling facilities and networks in the Borough including provision in new development as appropriate. These should provide improved access to Gravesend Town Centre and Ebbsfleet and to

other services and facilities in the Borough. In particular, the Council will seek the provision of pedestrian and cycle links between Northfleet and Ebbsfleet stations and along the River Thames, as part of the proposed Thames Estuary Path.

Land required for the possible future extension of Crossrail and to protect the High Speed 1 (HS1) railway is safeguarded on the Policies Map and proposals that would prejudice these will be refused.

The Council will support proposals which improve the efficiency of freight transport and provide opportunities for alternatives to road transport where possible. The Council will safeguard wharves, as shown on the Policies Map, subject to the provisions of paragraph 5.1.36 of Policy CS07 (Economy, Employment and Skills).

The Council will support proposals which facilitate the use of the River Thames for passenger transport and enable cruise liners to visit the Borough.

- 6.3.10 Gravesham's location on the River Thames means that river transport has historically been important and some riverside sites provide navigational sight lines and installations. There are a number of commercial wharves on the riverside at Gravesend and Northfleet.

Kent Minerals and Waste Local Plan 2013-30 (adopted September 2020).

- 6.3.11 Kent County Council are the minerals and waste planning authority for Kent, and plan for waste management capacity and mineral supply through their Minerals and Waste Local Plan. The plan includes strategic policies for minerals and waste development as well as development management policies used to determine planning applications.

- 6.3.12 Policies of relevance from this plan include:

Policy CSM 6 – Safeguarded Wharves and Rail Depots

Safeguarded Wharves and Rail Depots

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.

The following sites, and the allocated sites included in the Minerals Sites Plan, are safeguarded:

1. Allington Rail Sidings
2. Sevington Rail Depot
3. Hothfield Works
4. East Peckham
5. Ridham Dock (both operational sites)
6. Johnson's Wharf, Greenhithe
- 7. Robins Wharf, Northfleet (both operational sites)**
8. Clubbs Marine Terminal, Gravesend
9. East Quay, Whitstable
10. Red Lion Wharf, Gravesend
11. Ramsgate Port
12. Wharf 42, Northfleet (including Northfleet Cement Wharf)
13. Dunkirk Jetty (Dover Western Docks)
14. Sheerness
15. Northfleet Wharf
16. Old Sun Wharf, Gravesend

Their locations are shown in Figure 13: Minerals Key Diagram in Chapter 2 and their site boundaries are shown in Chapter 9: Adopted Policies Maps.

The Local Planning Authorities will consult the Minerals Planning Authority and take account of its views before making a planning decision (in terms of both a planning application and an allocation in a local plan) for non-mineral related development (other than that of the type listed in policy DM 8 (clause 1) on all development proposed at, or within 250m of, safeguarded minerals transportation facilities.

Policy CSM 7 – Safeguarding Other Mineral Plant Infrastructure

Facilities for concrete batching, the manufacture of coated materials, other concrete products and the handling, processing and distribution of substitute,

recycled and secondary aggregate material in Kent are safeguarded for their on-going use.

Where these facilities are situated within a host quarry, wharf or rail depot facility, they are safeguarded for the life of the host site. Where other development is proposed at, or within 250m of, safeguarded minerals plant infrastructure, Local Planning Authorities will consult the Minerals Planning Authority and take account of its views before making a planning decision (in terms of both a planning application and an allocation in a local plan).

- 6.3.13 Policy CSM 7 addresses the need to safeguard mineral production infrastructure, while being flexible to the needs of the industry by enabling the loss of capacity (potentially required for the industry to remain competitive and viable) provided there is replacement capacity available elsewhere of a type that is at least equal to that provided by the original facility.

Policy DM8 – Safeguarding Minerals Management, Transportation Production & Waste Management Facilities

Planning permission will only be granted for development that is incompatible with safeguarded minerals management, transportation or waste management facilities, where it is demonstrated that either:

1. it constitutes development of the following nature: advertisement applications; reserved matters applications; minor extensions and changes of use and buildings; minor works; and non-material amendments to current planning permissions; or
2. it constitutes development on the site that has been allocated in the adopted development plan where consideration of the other criteria (1, 3-7) can be demonstrated to have taken place in formulation of the plan and allocation of the site which concluded that the safeguarding of minerals management, transportation production and waste management facilities has been fully considered and it was concluded that certain types non-mineral and waste development in those locations would be acceptable; or

3. replacement capacity, of the similar type, is available at a suitable alternative site, which is at least equivalent or better than to that offered by the facility that it is replacing; or
4. it is for a temporary period and will not compromise its potential in the future for minerals transportation; or
5. the facility is not viable or capable of being made viable; or
6. material considerations indicate that the need for development overrides the presumption for safeguarding; or
7. It has been demonstrated that the capacity of the facility to be lost is not required.

Replacement capacity must be at least equivalent in terms of tonnage, accessibility, location in relation to the market, suitability, availability of land for processing and stockpiling of waste (and materials/residues resulting from waste management processes) and minerals, and:

- in the case of wharves, the size of the berth for dredgers, barges or ships
- in the case of waste facilities, replacement capacity must be at least at an equivalent level of the waste hierarchy and capacity may be less if the development is at a higher level of the hierarchy

There must also be no existing, planned or proposed developments that could constrain the operation of the replacement site at the required capacity.

Planning applications for development within 250m of safeguarded facilities need to demonstrate that impacts, e.g. noise, dust, light and air emissions, that may legitimately arise from the activities taking place at the safeguarded sites would not be experienced to an unacceptable level by occupants of the proposed development and that vehicle access to and from the facility would not be constrained by the development proposed.

Further guidance on the application of this policy will be included in a Supplementary Planning Document.

6.3.14 Policy DM8 sets out the circumstances when safeguarded minerals and waste development may be replaced by non-waste and minerals uses. This includes ensuring

that any replacement facility is at least equivalent to that which it is replacing and it specifies how this should be assessed.

6.3.15 In the case of mineral wharves the factors to be considered include the depths of water at the berth, accessibility of the wharf at various states of the tide, length of the berth, the size and suitability of adjacent land for processing plant, weighbridges and stockpiles, and existing, planned or proposed development that may constrain operations at the replacement site at the required capacity.

6.3.16 There also are circumstances when development proposals in the vicinity of safeguarded facilities will come forward. The need for such development will be weighed against the need to retain the facility and the objectives and policies of the development plan as a whole will need to be considered when determining proposals. Policy DM8 sets out the circumstances when development may be acceptable in a location proximate to such facilities. The policy recognises that the aim of safeguarding is to avoid development which may impair the effectiveness and acceptability of the infrastructure.

South East Inshore Marine Plan

6.3.17 Published June 2021 the South East Inshore Marine Plan provides guidance for sustainable development from Felixstowe in Suffolk to near Folkestone in Kent. Policies of relevance from the South East Inshore Marine Plan are:

SE-INF-2

(1) Proposals for alternative development at existing safeguarded landing facilities will not be supported.

(2) Proposals adjacent and opposite existing safeguarded landing facilities must demonstrate that they avoid significant adverse impacts on existing safeguarded landing facilities.

(3) Proposals for alternative development at existing landing facilities (excluding safeguarded sites) should not be supported unless that facility is no longer viable or capable of being made viable for waterborne transport.

(4) Proposals adjacent and opposite existing landing facilities (excluding safeguarded sites) that may have significant adverse impacts on the landing facilities should demonstrate that they will, in order of preference:

- a) avoid
- b) minimise
- c) mitigate - adverse impacts so they are no longer significant.

6.4 Updated Mineral and Waste Safeguarding Supplementary Planning Document (adopted March 2021)

6.4.1 Kent County Council has produced an “Updated Mineral and Waste Safeguarding Supplementary Planning Document” which was adopted in March 2021 and is to be read alongside the Kent Minerals and Waste Local Plan 2013-30.

6.4.2 This document sets out how the relevant policies are applied in respect of the safeguarding of minerals infrastructure and land within 250m of safeguarded sites that is subject to a proposal for non-minerals related development. The information requirements for planning applications affecting safeguarded minerals infrastructure are also set out in the SPD.

6.5 Thames Vision 2050

6.5.1 The Port of London Authority alongside a range of stakeholders and interested parties have come together to promote ‘*a shared vision of how the Thames can be a greater resource for local communities and better serve the nation as a global maritime centre*’.

6.5.2 A report produced as part of formulating the vision by Oxford Economics (Future trade through the Port of London (May 2021)) identifies that, “*historic aggregates volumes carried along the Thames have been heavily influenced by major projects*”. The report indicates that where a product is linked to construction activity, it will be volatile over a period of time. It provides forecasts based on low, central and high trade assumptions. With regards to aggregates, the trend is for growth up to 2050 which is forecast at 1%, 32% and 67% respectively for ‘low trade’, ‘central’ and ‘high trade’ respectively.

6.5.3 Summary

6.5.4 Robins Wharf is clearly afforded a degree of protection by being safeguarded in the Minerals and Waste Local Plan. The safeguarding appears to have a level of conflict in the Gravesham Local Plan which promotes significant development. Whilst it is a for

a development to provide sufficient mitigation to protect against harm under the 'agent of change' principle, contrasting land uses must be carefully managed.

6.5.5 We consider the proposals against the planning policy below.

7 APPRAISAL AGAINST PLANNING POLICY

- 7.1.1 Section 38(6) of the Planning and Compulsory Purchase Act 2004 states that, *“If regard is to be had to the development plan for the purpose of any determination to be made under the planning Acts the determination must be made in accordance with the plan unless material considerations indicate otherwise”*. The planning case for the wider development is made elsewhere within the Planning Statement and other supporting documents. It is not the intention of this report to set out in detail any planning balance.
- 7.1.2 This report is focussed on the proposed redevelopment of part of the application site that currently functions as a wharf in use for minerals importation.
- 7.1.3 In accordance with paragraph 210 of the National Planning Policy Framework 2021, Kent County Council has identified in its Minerals and Waste Local Plan, a number of safeguarded wharves including Robins Wharf in Northfleet. The site is subject to a range of planning policies within the Minerals Local Plan, particularly DM8. In considering this, it is also relevant to consider other statutory development plans that may affect sites alongside other material considerations.
- 7.2 *Gravesham Local Plan & Gravesham Local Plan Core Strategy*
- 7.2.1 As indicated above, the Development Plan for the application site includes the Gravesham Local Plan Core Strategy Policy CS03 – Northfleet Embankment and Swanscombe Peninsula East Opportunity Area which designates the land within the safeguarded Robin’s Wharf as an Opportunity Area, more specifically, the land falls within sub-area 1.3 – Land East of Grove Road and Robin’s Creek Key Site.
- 7.2.2 The designation of this site along with the text provided in the Council’s Core Strategy suggests that this is an area that should be developed. It is recognised that the key site, Robins Creek, does not form part of the land within the application site, however, the policy wording does not specify that any development of this sub-area should be focused entirely within the key site. As such, the Policy CS03 covers the entirety sub-area 1.3.
- 7.2.3 The Core Strategy emphasises how development of this sub-area should be a residentially led mixed-use development and how a development of this nature would enhance Robin’s Creek and the Ebbsfleet Stream by improving greenspace and reducing heavy commercial traffic and parking on Grove Road.

- 7.2.4 The Policy CS07 – Economy, Employment and Skills and further text within the Core Strategy demonstrates that the Council realise that the development opportunity areas may result in the loss of existing commercial wharves and landside supporting infrastructure but state that their loss will not be supported unless:
- a study and supporting evidence shows they are no longer viable for marine related employment purposes or
 - they are incapable of being made so at reasonable cost, and it has been shown that there is no demand for them through market research or
 - appropriate alternative provision is available or will be provided as part of the rationalisation of facilities that, as minimum, maintains capacity and provides equivalent or better facilities.
- 7.2.5 As such, providing one of the above-mentioned pieces of evidence is evidenced to support the loss of Robins Wharf, the proposals would accord with the requirements of Policies CS03 and CS07.
- 7.2.6 It is concluded in Section 5 of this report that there is sufficient capacity in the existing wharves in Kent (currently at 61% capacity) and that the loss of the individual site capacity of Robins Wharf (c.304,000 tonnes) can be accommodated by the other safeguarded wharves.
- 7.2.7 As such, it is concluded that available alternative provision for aggregate importation is available in nearby wharves and that the Policy requirements of CS03 and CS07 can be met.
- 7.3 *Kent Minerals and Waste Local Plan 2013-30 (adopted September 2020).*
- 7.3.1 Policy CSM 6 - Safeguarded Wharves and Rail depots states that proposals for non-minerals development will not be permitted should said development unacceptably adversely affect safeguarded minerals infrastructure facilities. Robins Wharf, Northfleet is identified as a safeguarded wharf.
- 7.3.2 Policy CSM 7- Safeguarding Other Mineral Plant Infrastructure states that added value plant such as concrete and coated materials plant are safeguarded for ongoing use where situated in a safeguarded wharf for the life of the host site. The Operators Tenant's readymix concreting plant and asphalt plant are therefore safeguarded by Policy CSM7 for the lifetime of Robins Wharf.

7.3.3 Policy DM 8: Safeguarding Minerals Management, Transportation Production & Waste Management Facilities states that proposals for development that are incompatible with safeguarded minerals management facilities will only be granted planning permission where it is demonstrated that either:

- i. the proposal constitutes minor applications; reserved matters, change of use etc; or
- ii. the proposal is allocated in the adopted development plan; or
- iii. a suitable alternative minerals infrastructure site has been identified; or
- iv. the proposed development is for a temporary period; or
- v. the existing facility is not viable; or
- vi. the need for the proposed development overrides the presumption for safeguarding; or
- vii. the capacity of the minerals infrastructure facility to be lost is not required.

7.3.4 Policy DM8 is clear that only **one** of the specified criterion needs to be satisfied; they are expressed as being 'either/or' requirements.

Policy DM 8: Criterion 6 – whether the need for the proposed development overrides the presumption for safeguarding

7.3.5 The demolition of all existing buildings and structures, including Robins Wharf would facilitate the construction of a significant mixed-use development. This development would comprise of residential units, a hotel, a new football stadium with associated business and leisure facilities, a range of commercial, business and service uses including retail and food and beverage uses, community uses and a range of sui generis uses, with associated public realm and hard and soft landscaping, highways works, car parking, access and servicing arrangements, infrastructure and ancillary works and associated works.

7.3.6 The socio-economic assessment of the proposed scheme has identified a number of benefits arising from the scheme, which are in addition to the much needed supply of housing given the Council's undersupply and pressures within north-Kent arising from nitrate neutrality matters. The benefits of the proposed development are discussed further within the planning statement accompanying the application, but are in summary:

- During construction, the Proposed Development is expected to generate at least:
 - 6,755 person years of employment

- ...which is equivalent to an average of 846 Full Time Equivalent jobs sustained for the entire duration of the build (estimated at 8 years)
- An additional 820 indirect and induced jobs (FTE) – created / supported within the construction supply chain and in the wider economy for the duration
- Approx. 120 apprenticeship starts and other on-the-job training opportunities
- £429m in Gross Value Added for the regional economy
- On completion, it is expected to generate a minimum of:
 - 2,250 direct jobs across a wide range of sectors – a net increase of around 1,750 on the estimated number of jobs currently based on site
 - 925 net additional jobs for local (Gravesham) residents, taking into account leakage, displacement and multiplier effects
 - £69m per annum in additional local (Gravesham) GVA
 - £20m per annum in resident retail and leisure expenditure
 - £5.6m per annum in additional council tax receipts, plus an uplift of c. £1.1m per annum in business rates compared with existing uses

7.3.7 It is anticipated that the proposed development would provide significant benefits to the area and local communities, including funding for school places, Health Service, the regeneration and improvement of public spaces and access affordable and family housing. Consequently, the benefits of the proposed development should be carefully weighed against Policy DM 8: Criterion 6.

7.3.8 It is considered that whilst there is a need to safeguard existing wharves to allow for future minerals import to serve the needs of Kent, the above significant benefits may act as a material consideration in the planning balance. It is not for this report to advocate the planning balance as this is contained in the wider planning submission package and for others to run the argument. However, in the context of this report, it is our firm assessment that there are significant material benefits that may outweigh the harm, that would satisfy Criterion 6.

Policy DM 8: Criterion 7 – whether the capacity of the minerals infrastructure facility to be lost is required

7.3.9 There are a number of wharves in close proximity to Robins Wharf, listed in Table 1 of this document. In the absence of published importation and sales figures for this facility, it is not possible to determine the exact proportion of aggregate imported and

its importance and individual contribution to the overall tonnage of aggregate imported via Kent's safeguarded wharves.

7.3.10 The estimated throughput for Robins Wharf represents a relatively small proportion of the total throughput in Kent and the wider Thames Estuary. It is asserted that there are better equipped wharves that have the capacity to increase production and to improve existing infrastructure to meet future demand. This includes where wharves are rail-linked for more sustainable exportation.

7.3.11 Criterion 7 can therefore be satisfied.

7.4 *South East Inshore Marine Plan*

7.4.1 The landing facility at Robins Wharf will remain in situ and is not included within the red line boundary of the Site. The proposed development would be undertaken on land adjacent and opposite the landing facility.

7.4.2 It is recognised that the proposed development would result in a significant adverse impact on an existing safeguarded facility through the loss of the functionality of Robins Wharf, however, that loss is considered to be outweighed by the significant socio-economic benefits that the proposed mix-use development presents. Again, it is asserted that the loss of the individual site capacity of Robins Wharf can be accommodated by the other safeguarded facilities within close proximity.

8 CONCLUSION

- 8.1.1 The proposed non-minerals development would include the total loss of all mineral facilities at Robins Wharf.
- 8.1.2 The proposal should be considered against the development plan and in particular KMWLP Policy DM8, and specifically in this case against criteria 6 and 7. The development will also be considered against the Gravesham Local Plan. A full exposition of the need for the development and the benefits arising from it is contained within the Planning Statement submitted in support of the application.
- 8.1.3 Detailed consideration has been given to the objections that have been raised alongside other comments. We have revised the assumptions based on the latest available data.
- 8.1.4 It remains our firm assertion that there remains significant underused capacity evidenced in the other safeguarded wharves and that whilst there is a planning balance to be ultimately made in the context of the overall scheme, that loss of Robins Wharf can be mitigated through diversion of capacity elsewhere to existing wharves, particularly where the existing infrastructure and future potential for improvements to infrastructure can be accommodated.
- 8.1.5 The proposals meet the requirements of both criteria 6 and 7 within Policy DM8.

APPENDICES

Appendix 1: Policy CSM 6: Safeguarded Wharves and Rail depots

Appendix 2: Policy DM 8: Safeguarding Minerals Management, Transportation Production & Waste Management Facilities

Appendix 3: Policy CSM 7: Safeguarding Other Mineral Plant Infrastructure

Appendix 4: Marine Aggregates The Crown Estate Licences Summary of Statistics 2021

Appendix 5: Port of London Authority Maps

DRAWINGS

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