

SECTION C  
MINERALS AND WASTE MANAGEMENT

Background Documents - the deposited documents; views and representations received as referred to in the reports and included in the development proposals dossier for each case; and other documents as might be additionally indicated.

---

**Item C1**

**Cement production plant capable of importing raw materials and processing up to 500,000 tonnes per annum of cement on land off Great Basin Road, Port of Sheerness, Isle of Sheppey, Kent, ME12 1SW - SW/22/500629 (KCC/SW/0016/2022)**

A report by Head of Planning Applications Group to Planning Applications Committee on 7 December 2022.

Application by Hercules Enterprises for a cement production plant capable of importing raw materials and processing up to 500,000 tonnes per annum of cement on land off Great Basin Road, Port of Sheerness, Isle of Sheppey, Kent ME12 1SW - SW/22/500629 (KCC/SW/0016/2022).

Recommendation: Permission be granted subject conditions.

Local Members: Mr Andy Booth & Mr Cameron Beart

Unrestricted

**Site description**

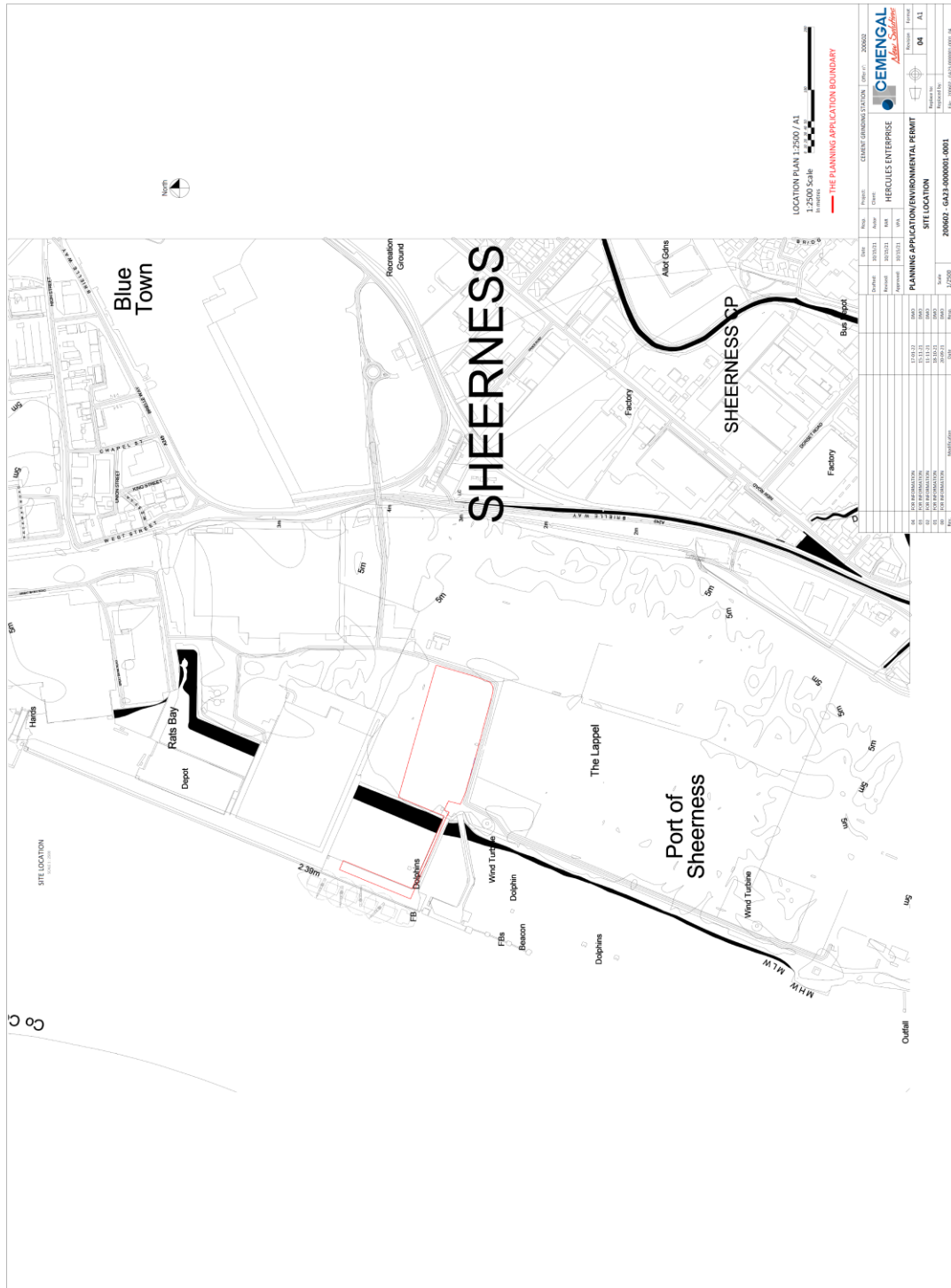
1. The application site is located within the Port of Sheerness in the northwest corner of the Isle of Sheppey on the northern coast of Kent. The proposed development would occupy approximately 2ha of land which is currently used for the short-term storage of building materials and vehicles prior to import/export. The site is accessed via an existing access from Great Basin Road within the boundaries of the Port of Sheerness. Great Basin Road would also be used during both construction and operation. The A249 (also known as Brielle Way between Queenborough and Sheerness) trunk road runs immediately to the east of the Port and is operated under the authority of National Highways. The Port of Sheerness is one of the largest foreign car importers in the UK and handles numerous other goods and imports from around the globe.
2. The surrounding site area is predominantly comprised of industrial land use. To the north of the site is the Stema aggregates operation and then the SCA UK Logistics Limited (Sheerness) building, and beyond is Rats Bay and further industrial units. Further north is the Garrison Point Fort, a Grade II Listed Building which marks the end of the Garrison Point peninsula. To the east is another large vehicle storage area and the A249. To the south is a wind turbine (the northern most wind turbine of a line of four wind turbines) and further large vehicle storage areas. To the west of the site is the mouth of the River Medway (where it meets the North Sea). The Medway Estuary and Marshes Special Protection Area (SPA), Special Scientific Interest (SSSI) and Ramsar sites are opposite the site to the west alongside the Isle of Grain and the same designations are also located further to the south of the site. Approximately 4km to the southeast is the Swale SPA, SSSI and Ramsar sites. The Sheerness: Royal

# Item C1

## Cement production plant capable of importing raw materials and processing up to 500,000 tonnes per annum of cement on land off Great Basin Road, Port of Sheerness, Isle of Sheppey, Kent ME12 1SW - SW/22/500629 (KCC/SW/0016/2022)

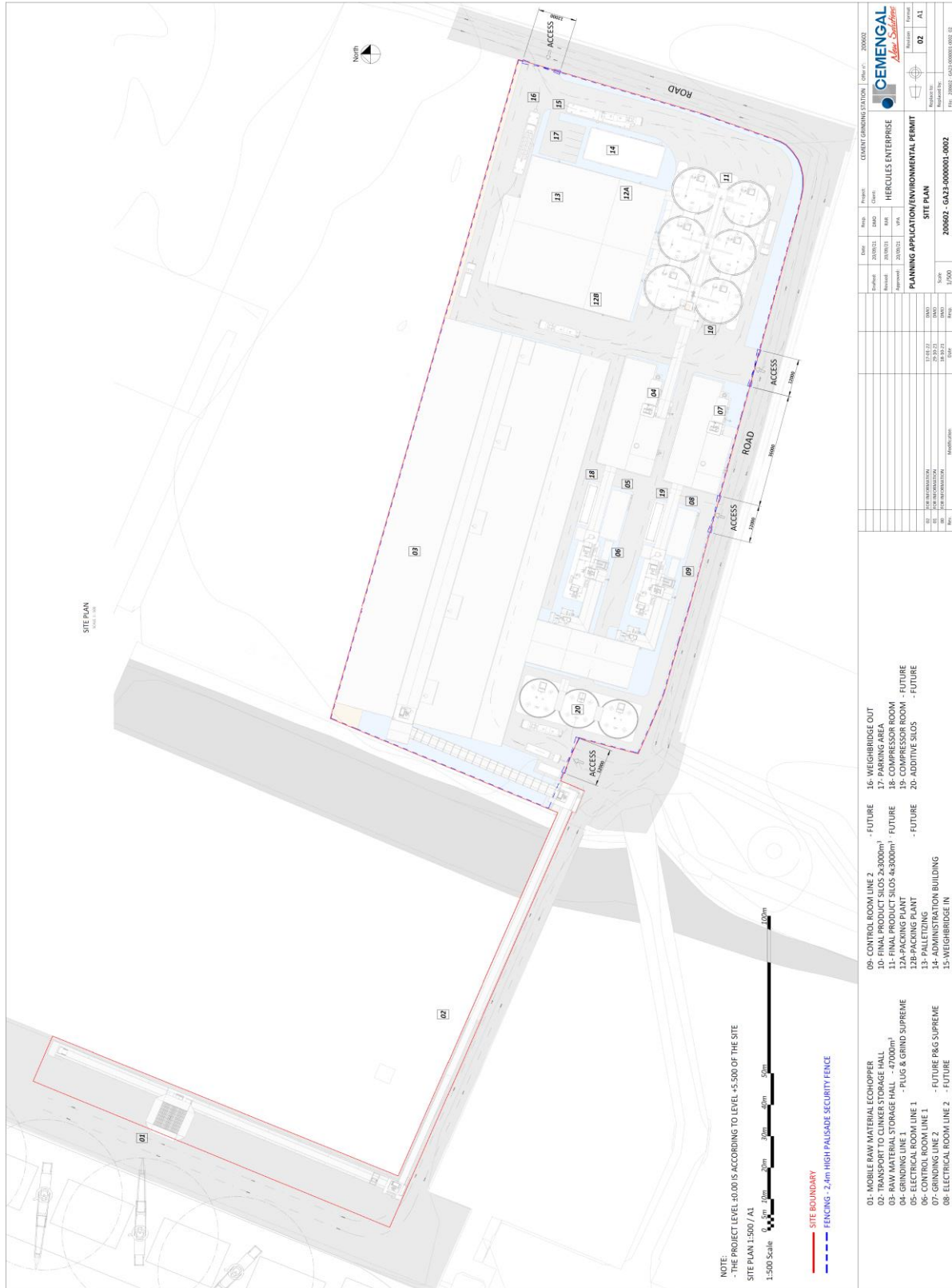
Naval Dockyard and Bluetown Conservation Area sits around 450m to the north of the proposed site, encompassing both land within the Port boundary and outside, and the Sheerness Defences Scheduled Ancients Monuments (SAM) forms the northern and eastern Port boundaries. The site location plan below illustrates the site location in a local context with the application site edged red.

### Site Location Plan



# Item C1 Cement production plant capable of importing raw materials and processing up to 500,000 tonnes per annum of cement on land off Great Basin Road, Port of Sheerness, Isle of Sheppey, Kent ME12 1SW - SW/22/500629 (KCC/SW/0016/2022)

## Site Plan





**Cement production plant capable of importing raw materials and processing up to 500,000 tonnes per annum of cement on land off Great Basin Road, Port of Sheerness, Isle of Sheppey, Kent ME12 1SW - SW/22/500629 (KCC/SW/0016/2022)**

**Site Access Arrangements**



**Cement production plant capable of importing raw materials and processing up to 500,000 tonnes per annum of cement on land off Great Basin Road, Port of Sheerness, Isle of Sheppey, Kent ME12 1SW - SW/22/500629 (KCC/SW/0016/2022)**

---

**Planning History and Background**

3. Planning permission (SW/16/501726) on land located to the east of the site at land across the A249 exists for the change of use from B2 Industrial use in the form of redundant steelworks to port related uses (sui generis) including demolition of buildings, construction of new paved surfaces and a new vehicle access and bridge spanning the A249 to the existing Port to the west, reconfiguration of the railhead, boundary treatment and landscaping and associated works. Since permission was granted in October 2016, several discharge of conditions applications have been submitted for the works, the most recent having been submitted in October 2020. Given this planning permission is for port related land uses it is therefore unlikely to include development which would be classified as 'sensitive receptors' (e.g. hospitals, schools, care homes, etc.). It is therefore considered unlikely that the proposed development would impact upon this nearby development. Immediately to the north of the application site is an aggregate import and distribution facility operated by Stema which comprises open air storage of aggregates. Material is imported by sea and transported to the storage areas from the dockside by conveyor belt. This operation takes place under the Port's permitted development rights.
4. In December 2021 a screening opinion pursuant to the Environmental Impact Assessment Regulations (EIA) 2017 was adopted by KCC under reference KCC/SCR/SW/0234/2021 and it was determined that the proposed cement production facility would not constitute EIA development.
5. Following the submission of the current application, legal advice was sought to determine whether an emerging development proposal in the vicinity of the application site should be regarded as 'committed development' for the purposes of assessing cumulative impact (e.g. traffic movements, noise, air quality, etc.). The development in question related to a proposed cementitious materials importation and storage facility on land at the Port. KCC issued an EIA Screening Opinion and Approval Under Regulation 77 of the Habitats Regulations in respect of this to Robert Brett & Sons Ltd (Brett) on 18 January 2022. This proposal, known as "T1", would occupy an area of land within the Port, a short distance to the north of the proposed development site, and be capable of handling up to 400,000tpa of Ground Granulated Blast Furnace Slag ('GGBFS'), Pulverised Fuel Ash ('PFA') and Ordinary Portland Cement ('OPC') per annum. Following the EIA Screening Request, KCC also responded to a consultation submitted under the Town & Country Planning General Permitted Development Order (GPDO) 2015 in which it was invited to give an officer view as to whether the development proposed in the Screening Request would be permitted development. After reviewing the provisions of Schedule 2, Part 8, Class B, and having regard to the above EIA Screening Opinion and Habitats Regulations Approval, officers were content that the proposed development could be considered permitted development under the provisions of the GPDO if it was implemented as proposed.
6. Officers have subsequently been made aware of a further proposal by Brett for another cementitious materials importation and storage facility at the Port. The new proposal

**Cement production plant capable of importing raw materials and processing up to 500,000 tonnes per annum of cement on land off Great Basin Road, Port of Sheerness, Isle of Sheppey, Kent ME12 1SW - SW/22/500629 (KCC/SW/0016/2022)**

---

(known as "W2") would be in place of, rather than in addition to T1. W2 would involve the importation of up to 700,000 tonnes per annum (tpa) of cementitious materials and be capable of storing up to 90,000 tonnes of materials at any one time. The arrival, unloading and departure of vessels supplying cementitious materials would take place 24 hours a day / 7 days a week.

7. A subsequent request to KCC for EIA Screening Opinion and Approval Under Regulation 77 of the Habitats Regulations in respect the W2 proposal was issued on 12 September 2022, which included an assessment of the possible environmental effects against the criteria set out in Schedule 3 of the EIA Regulations. This and the issued EIA Screening Opinion concluded that the proposed development would not be likely to give rise to significant environmental effects during the construction and operational phases (either individually or in combination with other projects). The Shadow Habitats Regulation Assessment concludes that the proposed development would result in no likely significant effects upon any European designated sites, either alone or in combination with other consented or proposed plans or projects. KCC has also responded to a consultation submitted under the Town & Country Planning General Permitted Development Order (GPDO) 2015 in which it was invited to give an officer view as to whether the development proposed in the Screening Request would be permitted development. After reviewing the provisions of Schedule 2, Part 8, Class B, and having regard to the above EIA Screening Opinion and Habitats Regulations Approval, officers were content that the proposed development could be considered permitted development under the provisions of the GPDO if it was implemented as proposed. It is our understanding that the W2 proposal is the development most likely to proceed. The legal advice referred to in paragraph 6 confirmed that T1 and W2 should be considered for the purposes of cumulative impact with the proposed development.
8. There are no other planning permissions for large-scale development in the immediate area that need to be considered in terms of cumulative impact.

**Proposal**

9. The proposed development would comprise a cement production plant capable of importing raw materials and processing up to 500,000 tonnes per annum of cement.
10. The plant would comprise the following key components:
  - Mobile raw material receiving eco hopper;
  - A mechanical transport system for transfer of materials into storage;
  - A raw material storage hall (47,000m<sup>3</sup>), including storage for gypsum (2,050m<sup>3</sup>) and limestone (2,050m<sup>3</sup>);
  - 2no. storage hall production lines;
  - 2no. control rooms;
  - 2no. electrical rooms;
  - 6no. 3,000m<sup>3</sup> final product silos;

**Cement production plant capable of importing raw materials and processing up to 500,000 tonnes per annum of cement on land off Great Basin Road, Port of Sheerness, Isle of Sheppey, Kent ME12 1SW - SW/22/500629 (KCC/SW/0016/2022)**

---

- 3no. 3,000m<sup>3</sup> additives silos;
  - packing plant;
  - palletising hall; and
  - an administration building.
11. The proposed development would comprise approximately 2ha in total. The tallest built components would be the finished product cement silos, standing approximately 53.3m in height from ground level (including the access tower). The ridge height of the main building which would house the majority of the production line would be 33m, and the belt conveyor to transport raw materials from the dock side to the main building would range from just above ground level to 28m in height.
  12. The overall process involves the importation of cement clinker and gypsum by sea, which are then carefully blended with limestone. The raw materials are ground into a fine powder in rotating horizontal grinding mills at ambient temperature to produce cement with the finished products being stored in silos prior to dispatch by way of bulk tanker or bagged and loaded onto an HGV. The process does not involve any inputs for burning, organic materials or water.
  13. Ground preparation would involve the minor re-profiling of the existing ground contours to establish those required for a suitable development platform. This may necessitate the off-site removal of a small amount of surplus materials which would be taken to an appropriate facility for recycling where possible, or may be used in the wider port should uses be found for any resulting materials.
  14. Once the site has been re-graded, appropriate materials would be imported to form the footprint of the operational area. Foundations for the finished surfacing and any drainage infrastructure would be installed. Piling for any of the major elements of the development would also be completed at this stage.
  15. When completed, the finished sealed surface areas within the site would be constructed in such a way so as to provide for surface water to be collected and transferred to the existing drainage infrastructure within the wider Port. Silt collection and hydrocarbon interceptors would be installed before excess surface water is transferred into the drainage infrastructure. Roof water would be directed to connections made into the existing infrastructure within the Port.
  16. The proposed built development would be of modular design and would arrive at the site part assembled; consequently, it would be a relatively straightforward process to erect the plant and buildings and it is also anticipated that some of the component parts of the equipment would be imported by sea. The plant and buildings would comprise the storage hall within which the three raw materials (clinker, gypsum and limestone) would be stored. This would then lead into two production line buildings which would contain the grinding mills and associated equipment. Next to this would sit a further two buildings which would house the electrical and control rooms for the site.



**Cement production plant capable of importing raw materials and processing up to 500,000 tonnes per annum of cement on land off Great Basin Road, Port of Sheerness, Isle of Sheppey, Kent ME12 1SW - SW/22/500629 (KCC/SW/0016/2022)**

---

17. The packing hall for bagged materials would be fed by sealed pipes from the finished product silos and once filled the bags would be palletised ready for distribution by HGV. Adjacent to the proposed packing hall would be the office suite and laboratories for regular testing to ensure appropriate quality control.
18. At the western end of these buildings would be 3 additive silos, while at the opposite end would be 6 cement silos, each with a capacity of 3,000 tonnes.
19. HGV tanker trucks would be loaded directly from the silos or products could be transferred into the packing and palletisation buildings. The packing and palletisation building would serve three functions: warehousing and storage of maintenance supplies; bagging and palletisation; and loading of platform trucks with the finished bagged products. The final building would house the administration services.
20. Parking spaces would be located alongside the administration building for 5 cars for site operatives and visitors.
21. It is proposed that the development would be constructed in two distinct phases as shown in the table below. Phase 1 is anticipated to take 18 months to construct following the discharge of pre-commencement planning conditions. Phase 2 is anticipated to commence 2-3 years from the initial plant operation, and it is estimated to take between 18 – 28 months. Whilst the proposed development is intended to be brought forward in two phases, the applicant is applying for planning permission for the entirety of the project.

**Phase**

**Components**

**Phase 1 – initial construction capable of processing 250,000 tonnes of cement per annum**

- Raw material receiving eco hopper;
- Transport system to clinker storage hall;
- Raw material storage hall;
- 1no. production hall line;
- 1no. control room;
- 1no. electrical room;
- 2no. final product silos;
- Administration building;
- Packing plant; and
- Palletising hall.

**Phase 2 – future construction after 2-3 years operation, doubling processing capability to 500,000 tonnes of cement per annum.**

- 1no. production hall line;
- 1no. electrical room; and
- 4no. final product silos.

**Cement production plant capable of importing raw materials and processing up to 500,000 tonnes per annum of cement on land off Great Basin Road, Port of Sheerness, Isle of Sheppey, Kent ME12 1SW - SW/22/500629 (KCC/SW/0016/2022)**

---

22. In terms of the importation of raw materials, 400,000 tonnes per annum (tpa) of clinker and 25,000 tpa of gypsum, which would make up approximately 85% of the raw materials, would be imported by sea, with shipments projected to be once a month in Phase 1 and twice a month in Phase 2. Once at the wharf, cranes would unload the raw material from the ship and transfer it onto a mobile eco hopper, which would be clad with a dust extraction system, from which the raw material would then be transported via a covered conveyor belt to the storage hall. The remaining raw materials, when the site would be fully operational, including approximately 6,500 tpa of limestone, would be imported via HGVs with unloading taking place within the raw materials storage hall. Apart from the initial clinker and gypsum offloading, all material movement would be under cover.
23. Once within the storage hall, the conveyor would transfer the raw materials to stockpiles where they would remain until required for use in the process. Raw materials would be removed from the storage stockpiles by means of a wheeled loader adding the products to enclosed reception hoppers that would transfer them in covered conveyors to the production lines.
24. The raw materials would be ground as they move through the production lines before being transferred into dedicated silos via the enclosed conveyor. The electrical and control rooms would provide monitoring of the whole process.
25. Due to the nature of the development (e.g. shipping movements and tides) it would be necessary to operate 24 hours per day, 7 days per week which is not uncommon for activities within the wider Port area. This would require some limited traffic movements to be staggered throughout the whole 24-hour period.
26. Given the dependent nature of shipping on the tides, it would be necessary to off-load vessels throughout the full 24 hour period, together with the use of the eco hopper to be located on the jetty and the associated conveyor system to the storage hall.
27. The final cement product would be transported off site via HGV, either in tanker trucks (bulk cement) filled directly beneath the product storage silos, or platform trucks after being transferred to the packing and palletisation building.
28. It is anticipated that the export process would produce approximately 30,000 two-way vehicular movements (i.e. 15,000 vehicles entering the site and 15,000 vehicles exiting the site via the same route) annually during Phase 1 (c.250,000 tonnes) and up to 60,000 two-way vehicular movements annually during Phase 2 (c.500,000 tonnes).
29. The applicant has outlined that some limited HGV movements would be required overnight to enable the applicant to meet customer expectations, however, it is anticipated that nearly all products would be exported from the site between the hours of 0600 to 1800 Monday to Friday and 0600 to 1600 on Saturdays.
30. During Phase 1, up to 32 employees, including possible maintenance visits, would be present on-site, which could increase to 52 workers during Phase 2. Staff would likely

**Cement production plant capable of importing raw materials and processing up to 500,000 tonnes per annum of cement on land off Great Basin Road, Port of Sheerness, Isle of Sheppey, Kent ME12 1SW - SW/22/500629 (KCC/SW/0016/2022)**

---

be distributed across the 24-hour period of operation in shifts. Visitor trips are anticipated to be minimal, likely to be around an additional single visit per day.

31. Due to the need for the development to operate during hours of darkness it would be essential for lighting to be provided to illuminate the site, including the eco hopper to be located on the wharf. Due to the site's existing use as an area for the short-term storage of building materials and vehicles prior to import/export, it already benefits from floodlighting through a network of existing columns that illuminate the access roads. Alternative lighting is proposed which is anticipated to be a reduction in the level of luminance compared with the existing situation.

**Planning Policy Context**

National Planning Policies

32. The most relevant National Planning Policies are set out in the National Planning Policy Framework (July 2021), National Planning Policy for Waste (October 2014) and the associated National Planning Practice Guidance on Air Quality (2019).
33. National Policy Statement (NPS) for Ports is part of the planning system established under the 2008 Act to deal with nationally significant infrastructure projects (NSIP) and provides the framework for decisions on proposals for new port development. While the proposed development is not a NSIP, the NPS provides an important overview of the essential role ports have in the UK economy.
34. In summary, it sets out that the Government seeks to:
- encourage sustainable port development to cater for long-term forecast growth in volumes of imports and exports by sea with a competitive and efficient port industry capable of meeting the needs of importers and exporters cost effectively and in a timely manner, thus contributing to long-term economic growth and prosperity;
  - allow judgments about when and where new developments might be proposed to be made on the basis of commercial factors by the port industry or port developers operating within a free market environment; and
  - ensure all proposed developments satisfy the relevant legal, environmental and social constraints and objectives, including those in the relevant European Directives and corresponding national regulations.

Kent Minerals and Waste Local Plan 2013-30 (as amended by Early Partial Review)  
(Adopted September 2020)

35. Policies CSM1 (Sustainable development), CSM8 (Secondary and recycled aggregates), CSM12 (Sustainable transport of minerals), CSW1 (Sustainable development), CSW2 (Waste Hierarchy), CSW3 (Waste reduction), DM1 (Sustainable design), DM2 (Environmental and landscape sites of international, national and local importance), DM3 (Ecological impact assessment), DM5 (Heritage assets), DM6 (Historic environment assessment), DM10 (Water environment), DM11 (Health and amenity), DM12 (Cumulative impact), DM13 (Transportation of minerals and waste),

**Cement production plant capable of importing raw materials and processing up to 500,000 tonnes per annum of cement on land off Great Basin Road, Port of Sheerness, Isle of Sheppey, Kent ME12 1SW - SW/22/500629 (KCC/SW/0016/2022)**

---

DM15 (Safeguarding of transportation infrastructure), DM16 (Information required in support of an application), DM17 (Planning obligations) and DM18 (Land stability).

Bearing Fruits 2031: The Swale Borough Local Plan (Adopted July 2017)

36. Policies ST3 (The Swale Settlement Strategy), ST4 (Meeting the Local Plan development targets), ST6 (The Isle of Sheppey area strategy), CP4 (Requiring good design), DM6 (Managing transport demand), DM7 (Vehicle parking), DM14 (General development criteria), DM19 (Sustainable design and construction), DM21 (Water, flooding and drainage), DM24 (Conserving and enhancing valued landscapes), DM28 (Biodiversity), DM32 (Development involving listed buildings), DM33 (Development affecting a conservation area) and Regen 3 (The Port of Sheerness: Regeneration Area).

**Consultations**

37. **Swale Borough Council** – No comments received in response to the most recent consultation on the revised noise assessment which included new baseline noise surveys, however, the following comments were received further to the earlier, and now superseded, noise assessment:

The proposed plant, machinery, associated traffic movements and operational hours would result in unacceptable noise levels to local sensitive receptors which have not been sufficiently mitigated. The proposal would result in unacceptable noise pollution which would result in harm to local amenity levels.

38. **Sheerness Town Council** – No comments received in response to the most recent consultation on the revised noise assessment which included new baseline noise surveys, however, the following objections were received further to the earlier consultation on the application:
- Extreme concerns regarding air quality and risk to residents.
  - Raises concerns over the viability of the proposal given the operation will be reliant on tides meaning that very few mitigating circumstances will be applied.
  - Impacts on air quality due to the toxic threat from gypsum and limestone coming in by road and then being stockpiled.
  - Concerns raised over the noise impact assessment, specifically the number of indicators being poor.
  - Ecology impacts.
  - Pollution impacts associated with extra shipping at the port.
  - Concern over the 24 hours operation.
  - Imperative that air quality is controlled.
  - The site will not provide significant employment.
  - Impact on the listed buildings and the Dock Wall within the Dockyard and Conservation area beyond.
  - Impacts on water supply.
  - Local roads beyond capacity already.

**Cement production plant capable of importing raw materials and processing up to 500,000 tonnes per annum of cement on land off Great Basin Road, Port of Sheerness, Isle of Sheppey, Kent ME12 1SW - SW/22/500629 (KCC/SW/0016/2022)**

---

- The access point via the A249 Dockyard Roundabout and outgoing movements for 500,000 tonnes is far too intensive for the roundabout and will only further contribute to the current traffic flow issues.
  - Access along the A250 Queenborough/Halfway Road would be unacceptable.
  - The operation would be extremely polluting and noisy to surrounding residents.
  - Proximity to residential areas would create unacceptable levels of disturbance and contamination.
39. **Minster-on-Sea Parish Council (one of the adjoining Parishes)** - Objects to the application for the following reasons:
- Impacts on air quality due to the toxic threat from gypsum and limestone coming in by road and then being stockpiled.
  - Difficulty in controlling dust emissions.
  - Traffic impacts in terms of noise and air quality.
  - Potential for run-off into the estuary.
  - Noise impacts on the local community.
40. **Environment Agency (Kent Area)** - No objection subject to conditions requiring the submission of a remediation strategy in the event the contamination not previously identified is found during construction and that no infiltration of surface water drainage is permitted other than with the written consent of the County Planning Authority.
41. **National Highways** – No objection subject to a condition requiring the submission of a Construction Management Plan.
42. **KCC Highways and Transportation** – No objection subject to conditions including the submission of a Construction Management Plan, provision and permanent retention of vehicle loading/unloading, turning and vehicle parking facilities.
43. **KCC Sustainable Urban Drainage** - No objection subject to conditions including the submission of a detailed sustainable surface water drainage scheme and subsequent submission of a Verification Report pertaining to the surface water drainage scheme.
44. **Southern Water** – No objection subject to conditions that include details of the proposed means of foul sewage and surface water disposal.
45. **Medway Council** - No comments received.
46. **KCC Sustainable Business and Communities** - No comments received.
47. **KCC Economic Development** - No comments received.
48. **KCC Air Quality Consultant (WSP Planning and Environmental Advice)** – No objections subject to the imposition of conditions covering the following:
- Before commencement on site, a Construction Dust Management Plan is to be submitted to and approved by Kent County Council. This is to be prepared in

**Cement production plant capable of importing raw materials and processing up to 500,000 tonnes per annum of cement on land off Great Basin Road, Port of Sheerness, Isle of Sheppey, Kent ME12 1SW - SW/22/500629 (KCC/SW/0016/2022)**

---

accordance with the Institute of Air Quality Management 'Guidance on the assessment of dust from demolition and construction'.

- Before commencement of operations on site, a Dust and Particulate Monitoring Plan is to be submitted to and approved by Kent County Council. The purpose of monitoring is to ensure that dust and particulate emissions from the site are managed effectively to avoid causing exceedances of ambient air quality standards and disamenity, and that dust and particulate matter from the site does not contain heavy metals such as chromium. The plan is to include action trigger levels for dust and airborne particulate matter, and site management procedure to investigate any exceedances of these trigger levels and put in place remedial measures in a timely manner.
- Before commencement of operations on site, an airborne particulate monitoring system is to be established to enable real-time measurements and alert the operator of the site to events that exceed trigger levels, which are to be set out in the Dust and Particulate Monitoring Plan.
- Before commencement on site, an Emissions Mitigation Assessment in accordance with the Air Quality and Planning Technical Guidance (Swale Borough Council) is to be submitted to and approved.

49. **KCC Noise Consultant (WSP Planning and Environmental Advice)** – No objections subject to the imposition of conditions covering the following:

- The rating level of noise from all operations, including ship deliveries and on-site vehicle movements, shall not exceed the following limits determined using BS 4142:2014+A1:2019. This would impose limits of 39 dB during the day, 36 dB during the night at locations MP1, 2 and 3 and 34 dB during the night at MP4 and 5. The submission, approval and implementation of a mitigation scheme in the event that noise limits were to be exceeded.
- Requirement for the operator to carry out noise monitoring and recording upon completion and operation of Phase 1, and upon completion and operation of Phase 2, with the County Planning Authority able to review these results as necessary to ensure compliance with the noise limits in place.
- Submission and approval in writing of a Noise Management Plan to include measures including, but not limited to, staff training, ship unloading procedures, use of klaxons, use of broad band reversing alarms for on-site mobile plant, use of horns, and containment of certain operations.

50. **UK Health Security Agency** - UKHSA note that the main areas of potential public health concern are particulate matter and nitrogen dioxide. Based on the details provided, with appropriate construction phase mitigation and providing that the proposed development complies with relevant national and local planning policies, any potential impact on public health should be insignificant.

51. **Natural England** – no objections, it is satisfied that there is sufficient distance between the proposed development and the designated sites to rule out impact.

52. **KCC Ecological Advisory Service** – No objection.

**Cement production plant capable of importing raw materials and processing up to 500,000 tonnes per annum of cement on land off Great Basin Road, Port of Sheerness, Isle of Sheppey, Kent ME12 1SW - SW/22/500629 (KCC/SW/0016/2022)**

---

53. **KCC Public Health** – No comments received.
54. **Historic England** – No comments to raise.
55. **KCC Landscape Consultant (WSP Planning and Environmental Advice)** – No objection.
56. **KCC Conservation Officer** – No objection.
57. **County Archaeological Officer** – No comments received.

**Representations**

58. The application was publicised by the posting of a site notice and an advertisement in a local newspaper.
59. In response to the publicity, 79 letters/emails objecting to the application including a letter from Friends of the Earth (Swale) and 2 letters/emails of support have been received. It should be noted that a significant number of the objections make reference to matters such as the storage of materials and operations taking place outside.
60. Submission of a petition entitled “Stop the installation of a cement works within Sheerness historic docks” signed by 1029 people (as of 25 November 2022).
61. The key points raised in the letters and emails can be summarised as follows:

Objections

- Size of the development;
- Noise impacts;
- Air quality impacts;
- Highways impacts;
- Effects on local tourism;
- Health impacts in terms of dust generated;
- Ecological impacts; and
- Inappropriate location for the development.

Support

- Site is on operational port land;
- The project represents significant inward investment of £25 million (Phase 1) and a further £15 million (Phase 2);
- Generation 32 jobs in Phase 1 and a further 20 jobs in Phase 2;
- The projects does not constitute EIA development and application has been accompanied by a comprehensive suite of environmental reports which have demonstrated the project will have no decipherable impact subject to mitigation and design measures;
- As a previously developed operational site and as a port dependent project it is considered the development accords with national and local planning policy.

**Cement production plant capable of importing raw materials and processing up to 500,000 tonnes per annum of cement on land off Great Basin Road, Port of Sheerness, Isle of Sheppey, Kent ME12 1SW - SW/22/500629 (KCC/SW/0016/2022)**

---

**Local Members**

62. County Council Members Mr A. Booth and Mr C. Beart (Sheppey) were notified of the application in February 2022 and again in July 2022 when a further round of consultation took place.

**Members' Site Visit**

63. On Monday 18 July 2022 a site visit was undertaken by Members of the Planning Applications Committee and locally elected Members. This site visit gave attendees the opportunity to visit the site of the proposed development. The visit also included a short presentation from the applicant and a question and answer session for Members.

**Discussion**

64. This planning application for a proposed cement production plant capable of processing up to 500,000tpa of cement on land off Great Basin Road, Port of Sheerness site is being reported to the Planning Applications Committee as a result of objections received from Swale Borough Council (no comments were received in response to the latest noise assessment consultation), Sheerness Town Council, Minster-on-Sea Parish Council, Friends of the Earth (Swale) and local residents.
65. Section 38(6) of the Planning and Compulsory Purchase Act 2004 requires that planning applications are determined in accordance with the development plan unless material considerations indicate otherwise. In the context of this application, the development plan policies outlined in paragraphs 32 to 36 above are of most relevance. Material planning considerations include the NPPF, NPPW and NPS referred to in paragraphs 32-34, the Kent Minerals and Waste Local Plan policies referred to in paragraph 35 and the Swale Borough Council Local Plan policies referred to in paragraph 36.

**Principle**

66. Paragraphs 7 – 14 of the NPPF sets out national policy on achieving sustainable development, including the three overarching objectives (economic, social and environmental), which are interdependent and need to be pursued in mutually supportive ways. The presumption in favour of sustainable development means approving development proposals that accord with an up-to-date development plan without delay. Paragraph 81 of the NPPF states that planning decisions should help create the conditions in which businesses can invest, expand and adapt. Significant weight should be placed on the need to support economic growth and productivity, considering both local business needs and wider opportunities for development.
67. Paragraph 187 of the NPPF requires planning decisions to ensure new development can integrate with existing business and community facilities. Where there are significant adverse effects the applicant should be required to provide suitable mitigation as part of the development. The focus of planning policies and decisions should be on whether proposed development is an acceptable use of land, rather than the control of processes or emissions (where these are subject to separate pollution



**Cement production plant capable of importing raw materials and processing up to 500,000 tonnes per annum of cement on land off Great Basin Road, Port of Sheerness, Isle of Sheppey, Kent ME12 1SW - SW/22/500629 (KCC/SW/0016/2022)**

---

control regimes, as in this case). Planning decisions should assume that these regimes will operate effectively.

68. National Policy Statement (NPS) for Ports sets out that the Government seeks to encourage sustainable port development catering for long-term growth of imports and exports by sea to ensure a competitive and efficient port industry thus contributing to long-term economic growth and prosperity; allow judgments about when and where new developments might be proposed to be made on the basis of commercial factors by the port industry or port developers operating within a free market environment; and ensure all proposed developments satisfy the relevant legal, environmental and social constraints and objectives.
69. It is considered that the proposed site layout demonstrates that the site is of adequate size and arrangement to accommodate the facility proposed and enable safe and efficient access, turning and egress of vehicles.
70. The proposed cement works is therefore considered to be in line with national and local planning policy and is in principle acceptable, however, it is still necessary to assess the application in terms of its need, and the impact in terms of the environmental impacts – noise and air quality, highways and transportation, landscape and visual impact, water environment, ecology and heritage matters.

**Need**

71. Policy CSM8 of the Kent MWLP states that proposals for additional capacity for secondary and recycled aggregate production including those relating to the expansion of capacity at existing facilities that increases the segregation and hence end product range/quality achieved, will be granted planning permission if they are well located in relation to the source of input materials or need for output materials, and have good transport infrastructure.
72. Policy CSM 12 sets out that planning permission for any new wharf and rail depot importation operations, or for wharves and rail depots that have been operational in the past (having since fallen out of use), that includes the transport of the minerals by sustainable means (i.e. sea, river or rail) as the dominant mode of transport will be granted planning permission, where:
- they are well located in relation to the Key Arterial Routes across Kent; and
  - the proposals are compatible with other local employment and regeneration policies set out in the development plan.
73. The market consumption of cement in London and the southeast is estimated at 2.3 million tonnes per annum and rising to 2.5 million tonnes by 2026. Upon completion of Phase 1 of the proposed cement production plant it would produce up to 250,000 tonnes of cement per annum (tpa), which would double to 500,000 tpa in Phase 2 following the installation of a second grinding mill.
74. Furthermore, the applicant outlines that £88.4 billion has been committed to new transport infrastructure by the UK Government, as detailed within the National

**Cement production plant capable of importing raw materials and processing up to 500,000 tonnes per annum of cement on land off Great Basin Road, Port of Sheerness, Isle of Sheppey, Kent ME12 1SW - SW/22/500629 (KCC/SW/0016/2022)**

---

Infrastructure Delivery Plan 2016-2021 including £15 billion to support National Highways in transforming the Strategic Road Network, including most notably the Lower Thames Crossing project. The Lower Thames Crossing Development Consent Order (DCO) application was recently submitted on 31 October 2022 by National Highways, if the project is agreed and able to progress to construction, the proposed cement plant would be well placed to support with the supply of cement for the project.

75. Fundamentally, the proposed development is intended to increase the supply of cement to the London and southeast market. Currently there is an under-supply of cement production in the region creating a reliance on importation from elsewhere in the UK and from overseas. This creates both an economic and carbon reduction opportunity to increase local supply. The development is also driven by facilitating productive use of available land and berthing facilities within the Port of Sheerness, supporting the Port's long-term viability.
76. The largest demand for cement is to ready-mix concrete plants, followed by concrete products. Currently, the majority of cement demand in the UK is sourced from a small number of large plants, mostly based in the Midlands and northern England. The majority of cement used in the London and southeast market is imported to the region either from these plants or from overseas. Development of new capacity at existing plants is limited by carbon reduction targets and exhaustion of the minerals resource and permissions on which the plants depend. Hence, new capacity entering the UK market is very limited and no new producer of cement has entered the southeast market for at least 15 years. Therefore, the proposed development would assist in meeting demand whilst helping to reduce carbon emissions due to the reduction in the distance that the existing supply has to travel.
77. Use of imported clinker provides an opportunity to increase UK cement production using smaller plants that have much reduced emissions, are more flexible in terms of siting and land requirements and without reliance on access to primary minerals resource and the associated environmental cost of developing new quarries and processing facilities. Clinker is readily available as an import product but requires secondary processing to produce cement (once it is blended with the other materials proposed in the application), of which there are very few suitable facilities in the south-east. It is this need that the proposed development is intended to serve.
78. Cement production from imported clinker as proposed needs to be located close to suitable port facilities to avoid the economic and carbon cost of transporting clinker long distances by road. The availability of docking facilities, and of suitable development land within the Port is the main reason for selection of the proposed site. A secondary benefit is the availability of facilities for barge loading and transport of cement to regional markets, in particular to the London area. The plant is intended to be in production for the long term thus bringing a secure employer to the Port, and opportunities for local and regional sub-contractors both during construction and in subsequent operation.
79. Policy CSM3 relates to the safeguarding of the Medway Cement Works strategic minerals site. This permission has been implemented but the site remains substantially undeveloped, and production has not commenced. It is likely that modification to the plant as approved would now be required to comply with Government carbon reduction

**Cement production plant capable of importing raw materials and processing up to 500,000 tonnes per annum of cement on land off Great Basin Road, Port of Sheerness, Isle of Sheppey, Kent ME12 1SW - SW/22/500629 (KCC/SW/0016/2022)**

---

objectives. The proposed development is relatively small in comparison to the Medway Cement Works permission referred to in Policy CSM3, comprising 250,000 tpa in Phase 1, increasing to 500,000 tpa in Phase 2. With reference to the data referred above, the proposed plant even when at full capacity would only be able to supply a maximum of around 20% of the regional demand. It is understood that the Medway Cement Works permission would allow up to 1.4M tpa, although this may need to increase to fund the viability of the carbon capture plant that would now be required for its operation in compliance with government carbon reduction policies.

80. In March 2020 a cement production plant was permitted at Thamesport on the Isle of Grain by Medway Council. The facility when fully operational, would produce around the same amount of cement per annum as the proposed development. Whilst the cement production would also take place inside a building, the raw materials would be unloaded on the dockside and transported to the storage hall by HGV or dump truck. This process is predicted to take up to 40 hours per vessel and it is likely that four HGVs (or dump trucks) would be used every time a vessel is unloaded. It is also predicted the importation of raw materials would give rise to around 46 ships arriving each year and the export of finished product would give rise to a maximum of 196 HGV movements (98 in and 98 out) per day. This is a significantly more complex and emission intensive development than what is being proposed by this development as the raw materials would travel directly via enclosed conveyor from the dockside to the storage hall without any HGV (or dump truck) assistance, as would be the case at the development on the Isle of Grain.
81. For the reasons identified above, it is considered that there is sufficient market demand in the southeast and London region that both the proposed development, the Medway Cement Works and the Isle of Grain facilities could operate within the existing market without one impacting the viability of the other. Even where operating in the same marketplace, the proposed development would be a relatively small competitor to the Medway works in comparison with other larger UK plants and cement imports from overseas.

**Environmental Impacts**

**Noise**

82. Paragraph 174 of the NPPF seeks development that prevents new and existing development from contributing to, being put at unacceptable risk from, or being adversely affected by, unacceptable levels of soil, air, water or noise pollution or land instability. Paragraph 185 of the NPPF states that new development should be appropriate for its location taking into account the likely effects of pollution on health, living conditions and the natural environment. It states that development should: mitigate and reduce to a minimum potential adverse impact resulting from noise – and avoid noise giving rise to significant adverse impacts on health and the quality of life; and identify and protect tranquil areas.
83. Policy DM11 of the MWLP states that development will be permitted if it can be demonstrated that it is unlikely to generate unacceptable adverse impacts from noise,

**Cement production plant capable of importing raw materials and processing up to 500,000 tonnes per annum of cement on land off Great Basin Road, Port of Sheerness, Isle of Sheppey, Kent ME12 1SW - SW/22/500629 (KCC/SW/0016/2022)**

---

amongst other matters. Policy DM14 of the SLP states that new developments must cause no significant harm to amenity and other sensitive uses or areas.

84. The proposed development has the potential to generate noise during construction; through the movement of raw materials and finished product to and from the site by up to 144 additional HGV movements per day; and through the operation of the cement production plant and associated machinery, all of which would be either undercover or within the proposed development's buildings.
85. The application is accompanied by a Noise Impact Assessment (NIA) that identifies the closest receptors, the noise sources associated with the proposed development, and the existing noise climate on and around the site. It considers the consequences of noise pollution affecting receptors and sets out a range of measures to reduce and manage noise from each activity. Following consultation with KCC's independent noise consultant, the original NIA was updated to the point that we have now reached in this report. The updated NIA included additional background noise surveys which provided accurate and a more suitable baseline data for the subsequent assessments.
86. Members will note that objections have been received from Swale Borough Council and Sheerness Town Council in relation to noise impacts from the development. Although it should be noted that neither have responded to the most recent consultation which saw the NIA updated to include new and additional background noise surveys and revised assessment of noise from site operations. This updated NIA has now satisfied KCC's noise consultant with regards to their earlier concerns regarding noise impacts, subject to the imposition of appropriate noise conditions which will be discussed in due course.
87. The objectives of the submitted Noise Impact Assessment (NIA) (as updated) are as follows:
- Identify noise sensitive receptors in proximity of the proposed development site and quantify existing background noise levels;
  - Predict potential noise levels during construction and operational phases of the development;
  - Assess predicted noise levels from the proposed development in accordance with appropriate standards; and
  - Provide, where required, initial recommendations for acoustic mitigation measures to reduce the noise emissions arising from the proposed development and assess the residual noise levels following their introduction.

Construction Phase Assessment

88. The construction works would involve the use of a variety of working methods, and operations which would vary throughout the construction period. Therefore, noise levels from the works are likely to vary significantly over time as the type of construction activities change. The exact working methodology and plant to be employed during the construction phase has not been conclusively established at this stage in the design. However, following best practice, an initial estimate of the

**Cement production plant capable of importing raw materials and processing up to 500,000 tonnes per annum of cement on land off Great Basin Road, Port of Sheerness, Isle of Sheppey, Kent ME12 1SW - SW/22/500629 (KCC/SW/0016/2022)**

---

expected noise levels over a representative period has been provided using assumed plant items and the associated noise emission data from BS 5228-1:2009+A1:2014.

89. For the purpose of predicting the likely noise impacts associated with the construction activities, the following phases of the works were considered in the NIA:
- general earthworks;
  - continuous flight auger (CFA) piling rather than driven / percussive piling, thereby creating significantly less noise and vibration;
  - reinforced concrete (RC) pile caps, ground beams, base slab and low level walls;
  - structural frame, cladding and primary plant installations; and
  - access roads, footways and car parks.
90. Construction working hours would be conditioned as part of any planning permission and limited to taking place only during daytime hours, between 07.00 to 18.00 Monday to Friday, and 07.30 to 13.00 on Saturdays. All work outside these hours would be subject to prior agreement with the County Planning Authority. Night-time working would be restricted to Emergency/exceptional circumstances only.
91. A daytime 10-hour working construction noise limit of 65 dB LAeq,T has been adopted as the threshold criterion to determine potentially significant noise impacts. This has been determined in accordance with the ABC method of BS 5228:2009+A1:2014 (Table E.1) based on the most exposed receptors. This represents a robust assessment as the survey results indicate some areas may qualify for lower category B threshold levels. Due to the distances between the site and surrounding sensitive receptors, vibration generated through the construction phase would be minimal and not discernible at the receptors. Any planning permission would be subject to the submission and approval in writing of a Construction Management Plan which would control, amongst other matters, construction hours of working, construction methods, access arrangements and control of noise during construction hours.

#### Vehicle Movement Assessment

92. Traffic noise predictions have been carried out at notional receptors located 10 m from the edge of the carriageway and 1.5m above ground level using the calculation methods set out in Calculation of Road Traffic Noise (CRTN) 1988. The Annual Average Weekday Traffic (AAWT) data referred includes the traffic associated with the other committed developments as agreed with KCC, including the Brett Aggregates development proposed for elsewhere within the Port.
93. Notional receptors are considered as it is the change in traffic noise level that is of interest, not the absolute noise levels at any given receptor. Provided that road traffic is the dominant noise component, the predicted changes in noise level would occur at noise sensitive receptors along each of the roads links.
94. To predict the potential impact of vehicle movements associated with the proposed development at receptors located along Garrison Road and Main Road, calculations have been undertaken using the haul route method provided in BS 5228-1. A maximum pass-by source sound power level of 104 dB LwA and 93 dB LwA has been

**Cement production plant capable of importing raw materials and processing up to 500,000 tonnes per annum of cement on land off Great Basin Road, Port of Sheerness, Isle of Sheppey, Kent ME12 1SW - SW/22/500629 (KCC/SW/0016/2022)**

---

assumed within the calculation for HGV and LGV movements respectively. This corresponds to the measurement data obtained during the baseline survey.

95. Based on the above typical source levels, the AM peak hour vehicle movements associated with the proposed development are likely to give rise to a free-field noise level of 57 dBLAeq,1hour at the most exposed noise sensitive receptor. Compared to the ambient noise level of 64 dB LAeq,T currently measured at the properties adjacent to the site access route, it is determined that the introduction of the additional vehicle movements at the proposed site may give rise to an increase to the existing ambient noise level of <1 dB. This is considered to be negligible and is unlikely to be a perceptible change to the existing noise level.
96. Based upon information provided by the operator and findings of the transport assessment, the following traffic profile has been adopted. The operator has advised that HGV movements would reduce to approximately 10% of the weekday flows on a Saturday, with no movements expected on Sundays. Such a reduction in required vehicle movements would be consistent with the current Port operating conditions recorded during the survey, where lower noise levels were recorded on Saturday and Sunday at residential properties within the Port boundary at the junction of Archway Road and Main Road. The existing number of vehicle movements along the site access route was not provided in the NIA, however based on survey observations it is apparent that there is a regular flow of HGVs travelling along Garrison Road and Main Road. These movements are the dominant source in terms of measured ambient sound levels currently incident upon the sensitive receptors.
97. To predict the potential impact of vehicle movements associated with the proposed development at receptors located along Garrison Road and Main Road, calculations were undertaken using the haul route method provided in BS 5228-1 (Section F.2.5.2). A maximum pass-by source sound power level of 101 dB LwA and 93 dB LwA was adopted within the calculation for HGV and LGV movements respectively; this corresponds to the measurement data obtained during the baseline survey and is considered a more robust representation of the noise levels arising from vehicle movements on the road link in question than utilising data from a reference standard (which may not have been measured under comparable conditions).
98. The revised NIA presented the predicted change in ambient noise level anticipated as a result of the projected vehicle movements and during all measured periods, this corresponded to a change of < 2dB in the worst case hour, with most periods anticipated to result in a change of 1dB or less. This would be considered to be a minor change in noise level which would not be perceptible to most individuals. The outcome of the assessment therefore indicates that it is unlikely that the vehicle movements associated with the proposed development would give rise to a significant adverse impact upon noise sensitive receptors located adjacent to the proposed access route. Upon leaving the Port vehicles would immediately join the trunk road network onto the A249 and as such it is considered that noise impacts as a result of the increase vehicle movements would be negligible.
99. Following the final consultation on this aspect of the NIA, concerns were raised again by the noise consultant regarding the impacts of mitigating nighttime noise impacts on the nearest residential receptors within the Port site (at the junction of Garrison Road

**Cement production plant capable of importing raw materials and processing up to 500,000 tonnes per annum of cement on land off Great Basin Road, Port of Sheerness, Isle of Sheppey, Kent ME12 1SW - SW/22/500629 (KCC/SW/0016/2022)**

---

and Main Road). In order to further mitigate the potential impacts for these properties the applicant has agreed to a condition being imposed on any future planning permission requiring HGVs to use an alternative route to enter and exit the Port, which would see vehicles travelling north of the affected properties rather than directly passing them, the alternative route can be seen below in Figure 2 and on the plan on page C1.5. In addition, the applicant has confirmed additional measures regarding nighttime vehicle movements which would be controlled via a condition to include, but not limited to, the following matters:

- Overnight HGV movements (between 6pm and 6am) to only be permitted on a maximum of one night-time period per calendar month and not to exceed eight such movements in that period;
- Movements to only occur on weekdays and not at all in the period after 6pm on a Saturday until 6am on a Monday;
- Movements in the night-time period to be notified in advance to the residents of the properties on Garrison Road in writing; and
- All vehicles arriving or leaving the site in night-time hours will utilise the alternative route to avoid passing the most sensitive properties on Garrison Road, as shown on the submitted plan (and Figure 2 below).

**Operational Phase Assessment – Plant & Site Equipment Emissions**

100. The proposed development would introduce a number of sound generating sources across the application site, with the exception of the vehicle movements (discussed above), these would typically operate continuously over long periods such that they would be considered steady-state. While the final plant specification is subject to detailed design, initial anticipated emission levels for Phase 1 of the development have been provided as part of the application. To account for the likely Phase 2 emissions, any sources associated with the Phase 1 grinding line have been duplicated and sited accordingly as per the proposed site layout plan. Additional sources have been added to the list to account for forklift truck movements, within the packing and palletisation building. Although at most only occurring twice per month, sources have been included within the modelling to account for sound associated with ship engine idling and crane unloading.
101. The predicted sound emissions generated by the operation of the proposed scheme have been calculated at the surrounding noise sensitive receptors using computer noise modelling software. The modelling software calculates industrial sound from mobile and static sources in accordance with the methodology set out in ISO 9613-2. The ISO 9613-2 method predicts sound levels under meteorological conditions favourable to propagation from the sound source to the receiver.
102. The NIA provided a comprehensive list of the sources adopted in the model, the assumed sound power levels and location of each item. The assessment included a significant number of noise sources and the predicted specific sound levels at individual receptors are determined by the cumulative total of all noise sources, rather than being determined by individual items. To illustrate this, the predicted noise levels from the highest ten sources at an example location along New Road were modelled.

**Cement production plant capable of importing raw materials and processing up to 500,000 tonnes per annum of cement on land off Great Basin Road, Port of Sheerness, Isle of Sheppey, Kent ME12 1SW - SW/22/500629 (KCC/SW/0016/2022)**

---

As a result, there would not be any distinguishable on / off conditions at the surrounding receptors if individual items of plant / equipment were switched off.

103. Additional predictions were also undertaken to demonstrate potential maximum noise levels from events such as reversing alarms and metal impacts during loading / unloading activities. Source levels have been derived from RSK measured data at other such facilities as follows:
- Tonal reversing alarm: 75 dB LAFmax at 10m
  - Metal on metal impact during loading: 98 dB LAFmax at 10m
104. For purpose of the assessment, reversing alarms are assumed to be required externally in 2 areas of the site (identified as an HGV reversing manoeuvre on site plan 200602-GA23-0000001- 0002). While the majority of forklift movements would be within the packing building, impact noise from loading / unloading has been assumed to occur on the north elevation of Building 13, below the canopy.
105. The outcome of the predictions show an anticipated maximum noise level of up to 32 dB LAFmax when reversing alarms are in use and up to 55 dB LAFmax due to loading unloading activities. This does not account for localised screening effects that would occur from vehicles or material stockpiles in close proximity to the event. Based on the magnitude of the reversing alarms relative to existing noise levels, it is unlikely these would be clearly discernible at nearby noise sensitive receptors. While impacts from loading / unloading may be up to 55 dB LAFmax, this is below the current Lmax levels measured at the receptor location from existing industrial, commercial and transportation sources during both daytime and night-time periods. Furthermore, as these events would be infrequent in nature and occur over very short durations, based upon the magnitude and potential audibility relative to existing ambient sound levels, it is considered unlikely that the noise events would be clearly discernible above existing sources such that any rating penalty adopted would outweigh the on-time correction applied in line with the BS 4142:2014+A1:2019 methodology.
106. It is therefore considered that such short-term noise events would not give rise to significant adverse impacts and would be unlikely to be clearly identifiable as being from the proposed development site.
107. Based upon the findings of the additional background noise survey, analysis was undertaken to determine the typical background sound level recorded at each receptor location. In line with BS4142:2014+A1:2019 section 9.2, a +3dB character correction has been applied to the overall predicted specific sound level as general industrial sound may be distinguishable from the site during the quietest periods. However, as the receptors are presently subject to noise from transportation and industry sources, there is unlikely to be any single source from the application site which is readily discernible. This approach therefore represents a cautious estimation of potential impacts and is considered acceptable in these circumstances.

Operational Phase Assessment - Proposed Mitigation

108. To reduce sound levels arising from the development, the following acoustic mitigation measures are proposed to be implemented within the development.



**Cement production plant capable of importing raw materials and processing up to 500,000 tonnes per annum of cement on land off Great Basin Road, Port of Sheerness, Isle of Sheppey, Kent ME12 1SW - SW/22/500629 (KCC/SW/0016/2022)**

---

- The solid fabric elements of all buildings containing noise-generating sources should achieve a minimum sound insulation performance of 46 dB Rw. This includes all wall and roof elements and can be achieved through masonry construction or proprietary cladding systems.

109. To control noise emissions from the main grinding process, it is common in similar sites to construct the ground floor of the mill building from concrete, with two or three floors above containing other items of plant associated with the various stages of the grinding process. As the highest noise levels are likely to be from the ball mill grinding chamber typically sited on the ground floor, this may reduce the required performance specification at roof level (subject to the final internal building design). Access to the main grinding building should be for maintenance only.

110. The following noise sources should be reduced to not exceed the stated emission level. This can be achieved through enclosures, attenuators, or selection of lower-noise plant at detailed design stage:

Equipment description	Technical Notice	Stated LwA (dB)	Maximum LwA (dB)
Chutes (Various)	Material Flow	95	80
Fan (FN01)	Pressure Side	107	90
Fan (FN01)	Suction Side	105	90
Fan (FN02)	Pressure Side	105	90
Fan (FN02)	Suction Side	100	85
Tube Mill	Drive	102	87
Tube Mill	Gear Unit	109	94

111. It is recommended that all façade openings should be closed whenever not in use as a best practice measure to reduce noise emissions and the likelihood of complaint. Notwithstanding this, calculations have been carried out assuming access apertures for regular loading/unloading of materials would be open. Should the location of any opening or the plant within the building be revised from the current proposals, an updated scheme of mitigation may be required to ensure that the approved noise limits remain achievable in order to prevent adverse impacts upon nearby sensitive receptors.

112. Cumulative assessment of the proposed development in combination with other committed or approved developments in the Port is provided for in the assessment of noise impacts, with the developments T1 and/or W2 (as set out in paragraphs 5-7 above) included in that assessment. It is noted that the other developments referred to are already approved or are permitted development, so cannot be controlled or restricted through the current planning application. However, as stated these developments were included in the assessment of impacts and as such were taken into account in the assessment of the proposal and when assessed cumulatively with this proposal would not justify a refusal of the planning application on noise terms.

**Cement production plant capable of importing raw materials and processing up to 500,000 tonnes per annum of cement on land off Great Basin Road, Port of Sheerness, Isle of Sheppey, Kent ME12 1SW - SW/22/500629 (KCC/SW/0016/2022)**

---

113. KCC's noise consultant concluded their assessment by setting out that, on the basis of the revised NIA, which included the new baseline background noise surveys, that they have no objections to the proposal in terms of noise subject to the condition outlined in paragraph 99 above, and conditions to cover the following:
- The rating level of noise from all operations, including ship deliveries and on-site vehicle movements, would not exceed the following limits determined using BS 4142:2014+A1:2019, which would impose limits of 39 dB during the day, 36 dB during the night at MP1, 2 and 3 and 34 dB during the night at MP 4 and 5. This condition would include a requirement to submit, approve and implement a mitigation scheme in the event that noise limits were to be exceeded.
  - Requirement for the operator to carry out noise monitoring and recording upon completion and operation of Phase 1, and upon completion and operation of Phase 2, with the County Planning Authority able to review these results as necessary to ensure compliance with the noise limits in place.
  - Submission and approval in writing of a Noise Management Plan to include measures including, but not limited to, staff training, ship unloading procedures, use of klaxons, use of broad band reversing alarms for on-site mobile plant, use of horns, and containment of certain operations.
114. In the absence of any objections from key technical consultees including the KCC's Noise Consultant, I am satisfied that the development proposed by this application does not present an unacceptable risk in terms of noise and vibration impacts and I accept that there would be no significant adverse impact on amenity or the environment subject to the proposed mitigation and the imposition of the conditions referred to in paragraph 154 below. The NPPF makes it clear that the focus of planning decisions should be on whether the proposed development is an acceptable use of land, rather than the control of processes or emissions (where these are subject to separate pollution control regimes). Planning decisions should assume that these regimes will operate effectively. The proposed development is therefore in accordance with the NPPF, Kent Minerals and Waste Local Plan 2013-30 (as amended by Early Partial Review) (Adopted September 2020) Policies CSM12, DM2, DM3, DM5, DM11, DM12, and Bearing Fruits 2031: The Swale Borough Local Plan (Adopted July 2017) DM14, DM24, DM28, DM33 with regards to noise.

**Air Quality**

115. Paragraph 174 of the NPPF states that planning decisions should contribute to and enhance the natural environment by (amongst other things) preventing new and existing development from contributing to unacceptable levels of soil, air, water or noise pollution and that development should, wherever possible, help to improve local environmental conditions such as air and water quality.
116. Paragraph 185 states that planning decisions should ensure that new development is appropriate for its location considering the likely effects (including cumulative effects) of pollution on health, living conditions and the natural environment, as well as the potential sensitivity of the site or the wider area to impacts that could arise from the development. Paragraph 186 states planning decisions should sustain and contribute towards compliance with relevant limit values or national objectives for pollutants, taking account of the presence of Air Quality Management Areas (AQMAs) and Clean

**Cement production plant capable of importing raw materials and processing up to 500,000 tonnes per annum of cement on land off Great Basin Road, Port of Sheerness, Isle of Sheppey, Kent ME12 1SW - SW/22/500629 (KCC/SW/0016/2022)**

---

Air Zones (CAZs), and the cumulative impacts from individual sites in local areas. Opportunities to improve air quality or mitigate impacts should be identified, such as through traffic and travel management, and green infrastructure provision and enhancement. Appendix B of the NPPW states that proximity of sensitive receptors, including ecological as well as human receptors, and the extent to which adverse emissions can be controlled using appropriate and well-maintained and managed equipment and vehicles, should form part of the decision process.

117. The NPPG on Air Quality indicates consideration should be given to whether development would introduce a new point source of pollution, would expose people or biodiversity to pollutants (including European-designated sites) and if there would be significant effects on traffic both in the immediate vicinity and further afield, including congestion, changes in volume, vehicle speed or significantly altering the traffic composition on local roads. The NPPG encourages local planning authorities to work with applicants to consider appropriate mitigation to ensure the new development is appropriate for its location and unacceptable risks are prevented. Examples of mitigation include: the design and layout of development to increase separation distances from sources of air pollution; using green infrastructure (in particular trees) to absorb dust and other pollutants; means of ventilation; and promoting infrastructure that has a low impact on air quality.
118. The Government's Clean Air Strategy (2019) acknowledges that transport is a significant source of emissions of air pollution. Highlighting that the immediate air quality challenge is to reduce emissions of nitrogen oxides in the areas where concentrations of these harmful gases currently exceed legal limits. The strategy seeks to minimise the impact of petrol and diesel vehicles in the short term by ensuring that the cleanest conventional vehicles are driven on our roads, whilst working towards the Road to Zero Strategy, which sets out plans to end the sale of new conventional petrol and diesel cars and vans by 2040.
119. Policy DM11 of the MWLP seeks development that does not generate unacceptable adverse impacts from dust, emissions, traffic or exposure to health risks and associated damage to the qualities of life and wellbeing to communities and the environment. Development should ensure that there is no unacceptable adverse impact on other land uses. Policy DM12 states that developments should not result in an unacceptable adverse, cumulative impact on the environment or communities. Policy DM13 seeks development that demonstrates emissions associated with road transport movements are minimised as far as practicable, including emission control and reduction measures (where relevant), such as deployment of low emission vehicles and vehicle scheduling to avoid movements in peak hours. The proposed development is not sited, or within close proximity to an AQMA.
120. Policy DM6 of the SLP, amongst other matters, seeks to integrate air quality management and environmental quality into the location and design of, and access to, development and, in so doing, demonstrate that proposals do not worsen air quality to an unacceptable degree especially taking into account the cumulative impact of development schemes within or likely to impact on Air Quality Management Areas. Policy DM14 supports development that causes no significant harm to amenity and other sensitive uses or areas.

**Cement production plant capable of importing raw materials and processing up to 500,000 tonnes per annum of cement on land off Great Basin Road, Port of Sheerness, Isle of Sheppey, Kent ME12 1SW - SW/22/500629 (KCC/SW/0016/2022)**

---

121. The proposed development has attracted a significant number of objections on air quality grounds. These relate to the potential for dust and airborne emissions to be generated on site. The vast majority of these concerns erroneously relate to issues with storage and stockpiling of raw materials in the open air, which could cause air blown emissions impacts, however, all storage of materials would be within enclosed buildings, indeed the method for transporting raw materials from the dockside to the storage buildings would be within an enclosed conveyor belt system.
122. The application included a detailed Air Quality Assessment to assess the potential for impacts of the development in air quality terms. This assessment focused on both the construction and the operational phases. The assessment was undertaken with reference to existing air quality in the area and relevant air quality legislation, policy and guidance and the assessment concluded the following.

Construction Phase

123. The operation of vehicles and equipment powered by internal combustion engines results in the emission of exhaust gases containing the pollutants NO<sub>x</sub>, PM<sub>10</sub>, volatile organic compounds, and carbon monoxide. The quantities emitted depend on factors such as engine type, service history, pattern of usage and fuel composition. Based on the temporary nature of the construction activities, it is considered unlikely that vehicle movements associated with staff commuting to and from the site would have a significant impact on local air quality. The operation of site equipment and machinery would result in emissions to atmosphere of exhaust gases, but with suitable controls and site management such emissions are unlikely to be considered significant.
124. Fugitive dust emissions arising from construction activities are likely to be variable in nature and would depend upon the type and extent of the activity, soil type and moisture, road surface conditions and weather conditions. Periods of dry weather combined with higher than average wind speeds have the potential to generate more dust. Fugitive dust arising from construction is mainly of a particle size greater than the PM<sub>10</sub> fraction (which can potentially impact upon human health), however, it is acknowledged that construction activities may contribute to local PM<sub>10</sub> concentrations. Appropriate dust control measures can be highly effective for controlling emissions from potentially dust generating activities identified above, and adverse effects can be greatly reduced or eliminated. Given the nature of the proposed site i.e., no existing buildings, no demolition work is proposed as part of the development and was not therefore considered within the assessment.

Operational Phase

125. During the operational phase, local air quality could be impacted from traffic exhaust emissions as a result of any changes in traffic flows or flow composition as a consequence of the proposed development. The transport consultants for the scheme have outlined that there would be a maximum of 144 HGVs (72 in/out) and 40 LGVs (20 in/out) totalling 184 total daily vehicle movements) which would be routed to the M2 via the A249, avoiding the closest AQMAs along A2 and B2006 in Sittingbourne. The Air Quality Assessment reviewed the available background air quality data and deemed that the likely road pollutant contribution from the development would not have a significant impact on local air quality from transport emissions.

**Cement production plant capable of importing raw materials and processing up to 500,000 tonnes per annum of cement on land off Great Basin Road, Port of Sheerness, Isle of Sheppey, Kent ME12 1SW - SW/22/500629 (KCC/SW/0016/2022)**

---

Emissions to Air from Operational Phase (Cement Grinding)

126. The predicted annual mean and daily mean PM10 concentrations at all the assessed discrete receptors sets out in the Air Quality Assessment would not exceed the relevant Air Quality Objective (AQO). The assessment showed the maximum annual mean PM10 at each discrete receptor point across the three meteorological years considered and all predicted total annual mean PM10 concentrations (PECs) would be below the annual mean PM10 Air Quality Standard (AQS) objective level at the receptors. The maximum annual mean PM10 concentrations was located next to the site boundary in an area not accessible by the general public. No further exceedances of the annual mean PM10 AQS were predicted across the assessment area. Consequently, exceedances of the annual mean PM10 AQS were not predicted at any of the modelled relevant discrete or gridded receptor locations.
127. An assessment of construction phase impacts has been undertaken following the IAQM construction dust guidance and mitigation measures were recommended to reduce the risk of dust and particulate matter being generated and re-suspended with implementation of the appropriate measures, no significant impacts are anticipated during the construction phase.
128. The principal air quality impact once the proposed development is complete and operational is likely to be emissions from the increased traffic on local roads surrounding the site and particulate matter emissions from the operation of the site. Concentrations of PM10 were predicted at the most relevant receptor locations. The air quality impacts of the proposed development on existing receptors was assessed and the predicted PM10 concentrations at all assessed receptors would not exceed the relevant AQOs.
129. A qualitative assessment of operational phase traffic emissions was undertaken by comparing the proposed development against the screening criteria outlined in the EPUK-IAQM guidance. Based on the findings of this comparison and the existing background air quality, it was considered that the proposed development is likely to have an insignificant impact on air quality at existing and proposed sensitive receptors once it is operational, such that the impacts can be considered insignificant. Based on the results of the assessment, it was judged that with appropriate construction phase mitigation, the proposed development complies with relevant national and local planning policies and that there would be no air quality impacts that would warrant refusal of the planning application.
130. KCC'S independent air quality consultant was consulted on the application and has confirmed that the submitted Air Quality Assessment and supplementary information has been carried out appropriately and in accordance with IAQM guidance and that they would not raise any objections on air quality grounds providing conditions covering the following matters are included on any future planning permission: a Construction Dust Management Plan; a Dust and Particulate Monitoring Plan; and an airborne particulate monitoring system to be established in accordance with the measures to be set out in the Dust and Particulate Monitoring Plan. Members will note that the air quality consultant also recommended that an Emissions Mitigation Assessment in accordance with the Air Quality and Planning Technical Guidance (Swale Borough Council) be submitted, however, this relates to emerging local plan

**Cement production plant capable of importing raw materials and processing up to 500,000 tonnes per annum of cement on land off Great Basin Road, Port of Sheerness, Isle of Sheppey, Kent ME12 1SW - SW/22/500629 (KCC/SW/0016/2022)**

---

policy so is afforded little weight in the decision making process as the policy has not been tested through the local plan adoption process, on that basis this additional assessment is not considered to be necessary.

131. Cumulative assessment of the proposed development in combination with other committed or approved developments in the Port is provided in the air quality assessment, with the developments T1 and/or W2 (as set out in paragraphs 5-7 above) included in that assessment. It is noted that the other developments referred to are already approved or are permitted development, so cannot be controlled or restricted through the current planning application. However, these developments were included in the assessment of impacts and as such were taken into account in the assessment of the proposal and when assessed cumulatively with this proposal would not justify a refusal of the planning application on air quality terms.
132. The UK Health Security Agency comments that the main areas of potential public health concern are particulate matter and nitrogen dioxide. Based on the details provided, with appropriate construction phase mitigation and providing that the proposed development complies with relevant national and local planning policies, any potential impact on public health should be insignificant.
133. Members will note from their visit to the site that there are existing operations within the Port which stockpile materials uncovered, not least the aggregate storage facility immediately adjacent to the proposed development site. It is possible for many of these activities to operate under the Port's extensive permitted development rights, with limited planning controls. It is worthwhile to note that the entire operation that is being proposed would be conducted under cover, significantly reducing the risk of dust emissions arising from the development being detected off site.
134. Members will also note that concerns were raised by local residents about the fire risks associated with the proposed development and in response to these comments the applicant has provided the following information. The proposed development does not present a significant fire or explosion risk. Cement products and dust are not flammable and there is no requirement for storage of flammable or explosive materials on-site. Whilst cement dust has a high surface area, its properties are such that it will not ignite even in the presence of an ignition source.
135. The applicant's experience of operating cement plants is that the main areas of explosion risk in an integrated cement plant comes from the clinker manufacture process, specifically due to:
  - use and storage of quarrying explosives;
  - storage, processing and transport of fuels;
  - power supply and generation;
  - heating & drying processes; and
  - electrical plant.
136. However, none of these sources would be present at the application site as clinker would be delivered by ship and not manufactured on site. The detailed design of the proposed development would nevertheless be required to adhere to all relevant

**Cement production plant capable of importing raw materials and processing up to 500,000 tonnes per annum of cement on land off Great Basin Road, Port of Sheerness, Isle of Sheppey, Kent ME12 1SW - SW/22/500629 (KCC/SW/0016/2022)**

---

standards and guidance, principally: Building Regulations, Fire Safety Approved Document B: Volume 2: Buildings other than Dwellings and British Standard 9999: Fire Safety Design of Buildings. It is therefore considered that the risk of fire or explosion is already very low, with opportunity for further reduction through the detailed design process, and therefore, is not a material consideration in the planning process, rather it would be addressed as part of other regulatory controls of the development.

137. Therefore, subject to the above mitigation measures being secured by condition, neither the KCC's Air Quality Consultant, UK Health Security Agency, Natural England nor the EA have raised specific concerns about emissions from the development impacting on the surrounding environment. The NPPF makes it clear that the focus of planning decisions should be on whether the proposed development is an acceptable use of land, rather than the control of processes or emissions (where these are subject to separate pollution control regimes). Planning decisions should assume that these regimes will operate effectively. The handling of cementitious materials is classified as a prescribed process under the Pollution Prevention and Control Regulations (2000) and a Local Authority Pollution Prevention and Control Permit would be required to operate at the Port, which in this case would be regulated by the Port of London Authority in conjunction with Swale Borough Council. This Permit would be required before operations can commence and would serve to control and monitor the activity to ensure it does not result in unacceptable emissions to the environment.
138. Subject to the further consideration of ecological matters, amongst others, in the sections below, and to conditions securing the dust mitigation measures set out in paragraph 130, I am satisfied that the proposed development would be in accordance with the NPPF, Kent Minerals and Waste Local Plan 2013-30 (as amended by Early Partial Review) (Adopted September 2020) Policies DM1, DM2, DM11 and Bearing Fruits 2031: The Swale Borough Local Plan (Adopted July 2017) Policies DM6 and DM14 relating to dust and air quality and would not warrant refusal on air quality grounds.

**Highways and Transportation Matters**

139. Paragraph 110 of the NPPF states that in assessing applications, it should be ensured that safe and suitable access to the site can be achieved for all users and that any significant impacts from the development on the transport network (in terms of capacity or congestion) or any highway safety can be cost effectively mitigated to an acceptable degree. Paragraph 111 states that development should only be prevented or refused on highway grounds if there would be an unacceptable impact on highway safety or the residual cumulative impacts on the road network would be severe.
140. Policy DM13 of the Kent MWLP states that developments will be required to demonstrate that emissions associated with road transport movements are minimised as far as practicable and by preference being given to non-road modes of transport. Where development requires road transport, proposals will be required to demonstrate that: (1) the proposed access arrangements are safe and appropriate to the scale and nature of movements associated with the proposed development such that the impact of traffic generated is not detrimental to road safety; (2) the highway network is able to accommodate the traffic flows that would be generated, as demonstrated through a transport assessment, and the impact of traffic generated does not have an

**Cement production plant capable of importing raw materials and processing up to 500,000 tonnes per annum of cement on land off Great Basin Road, Port of Sheerness, Isle of Sheppey, Kent ME12 1SW - SW/22/500629 (KCC/SW/0016/2022)**

---

unacceptable adverse impact on the environment or local community; and (3) emission control and reduction measures, such as deployment of low emission vehicles and vehicle scheduling to avoid movements in peak hours.

141. Policies CSW6, DM13 and DM15 of the KMWLP require development that (amongst other things) is well located to Kent's Key Arterial Routes, avoids giving rise to significant numbers of lorry movements through villages or on unacceptable stretches of road, benefits from safe access, and where the highway network has capacity to accommodate the traffic flows without unacceptable adverse impact on highway safety, the environment or local amenity. Policies DM6, DM7 and DM14 of the SLP seek to ensure that the cumulative impact of development on traffic generation would be acceptable in terms of the capacity of the highway network and/or would not lead to a decrease in safety.
142. Objections have been received from the Town & Parish Councils and local residents regarding the potential for highways impacts as a result of the proposed development particularly regarding vehicle movements using the local road network in the event that there are delays or closures on the strategic road network.
143. The site is located entirely within the Port of Sheerness and would be accessed via Great Basin Road and Garrison Road within the Port and the A249, which is in common with the other established uses within the Port. The Port is an established long-term operation and both it and the businesses that operate within it are significant local employers. The continued viability of the Port relies on it being able to attract import business, for which access to the strategic road network is a key requirement. Any uses that come forward within the Port, both now and into the future are therefore likely to generate road traffic movements and the proposed development is no exception. This is consistent with the nature and purpose of the Port and the highways network that serves it, as such it is important to assess whether the vehicle movements generated by this proposal would generate a significant detrimental impact on the road network.
144. The proposed development would be accessed by Great Basin Road via the A249, Garrison Road and Main Road via an existing hardstanding access road currently utilised by the short-term vehicle storage/waiting area for imported vehicles. As such, no new access would be required. The access route from the A249 is approximately 1km long and travels directly to the application site via the internal port access links.



## Item C1

### **Cement production plant capable of importing raw materials and processing up to 500,000 tonnes per annum of cement on land off Great Basin Road, Port of Sheerness, Isle of Sheppey, Kent ME12 1SW - SW/22/500629 (KCC/SW/0016/2022)**

145. The vehicular access route to the site from the A249 can be seen by the dotted line in Figure 1 below.



**Figure 1**

146. The proposed development would be operational 24 hours a day, 7 days a week. In Phase 1 the site would employ 32 members of staff increasing to around 52 once Phase 2 is operational. Staff would likely be distributed across the 24-hour period of operation in shifts. Visitor trips are likely to generate an additional single visit per day. Sufficient on-site employee and visitor parking would be provided in accordance with KCC vehicle parking standards and there would be adequate space on site to provide this level of parking.
147. Importation of the majority of raw materials would be by sea once a month during Phase 1, increasing to twice a month during Phase 2. The remaining raw materials of limestone and other additives would be imported via the road network. The finished product would be transported out of the site via HGV road tankers and lorries.
148. A number of Transport Assessments (TAs) have been submitted with the application, and in these it assumes all exports of final product would be via road, however, once operational, barge transport of finished product to the Thames Estuary and Greater London area is proposed, utilising the existing loading and docking facilities at the

**Cement production plant capable of importing raw materials and processing up to 500,000 tonnes per annum of cement on land off Great Basin Road, Port of Sheerness, Isle of Sheppey, Kent ME12 1SW - SW/22/500629 (KCC/SW/0016/2022)**

---

Port. This would act to significantly reduce the reliance on road transport; however, this option is still under development and would depend on the contracts secured by the plant once operational meaning that accurate quantification at the planning application stage is not possible. No reliance is therefore placed on barge transport for the purpose of the planning application, and the Transport Assessments assume the worst case that all finished products would be transported offsite by road. In reality though it is recognised as highly likely that at least some of the export of product from the site to Central London would take place by barge, given the difficulties and restrictions in place for vehicles accessing London.

149. It is understood that construction of the facility would be undertaken in 2 distinct phases, with Phase 2 commencing 2-3 years after Phase 1 which would be commenced as soon as possible following the granting of any future planning permission. During the construction period, it has been assumed that traffic would travel to and from the site using existing HGV traffic routes associated with the port via the A249.
150. The applicant's site selection process and decision to locate at the Port was in part driven by the ability to use the existing docking and loading/unloading facilities for sea transport. This greatly reduces the incoming vehicle movements that would otherwise be associated with clinker and raw material delivery, and also provides the ability to use barge transport for shipping finished product to the Thames Estuary and London area once the facility is operational.

Traffic Generation

151. Once operational, the site is predicted to generate the following peak daily vehicle movements (during 'Phase 2' as defined in the planning application). These figures are expressed as two-way movements, assuming each vehicle has to both enter and exit the site passing a given point twice (i.e. 144 two-way daily HGVs equates to 72 HGVs entering the site and 72 HGVs leaving the site by the same route).
152. The total daily vehicle movements would be 144 HGVs (72 in/out) and 40 LGVs (20 in/out) totalling 184 total daily movements. Notwithstanding the limits on night-time vehicle movements this equates to an average of around 6 HGVs and 2 LGVs (cars or vans) per hour.
153. The predicted peak hourly two-way movement as detailed in the Transport Statement would be 12 HGVs, this accounts for the fact that while the plant operates 24 hours, vehicle movements would predominantly occur during daytime working hours. I will come onto nighttime vehicle movements in due course.
154. An estimated 10% of the HGVs generated would be tipper trucks associated with limestone delivery, the remaining 90% would be tankers associated with the removal of the finished product from the site.

Traffic Assessment

155. The submitted TAs provide baseline traffic data for the A249 in the anticipated opening year of 2023. The 2023 daily two-way traffic flow on the A249 (Brielle Way) is:

**Cement production plant capable of importing raw materials and processing up to 500,000 tonnes per annum of cement on land off Great Basin Road, Port of Sheerness, Isle of Sheppey, Kent ME12 1SW - SW/22/500629 (KCC/SW/0016/2022)**

---

- 1,443 HGV, 10,796 LGVs = 12,239 total daily movements
156. To put this into context the proposed development would therefore lead to an increase in total traffic of around 1.3% and in HGV traffic of around 10.0%, however, by 2026 these numbers are predicted to have reduced slightly to 1.2% and 9.7% respectively due to forecast growth in baseline traffic over that period.
157. Members should note that these predictions can be regarded as realistic worst case as they assume that the plant is always operating at absolute maximum Phase 2 capacity, and that there would be no sea transport of the finished product. The data also assumes that all traffic generated by the proposed development is 'new' to the network, i.e. that there is no displacement of traffic already occurring due to other activities currently taking place at the site but which would cease as a result of the proposed development.
158. The TA assumes that all HGV traffic would access the site via the A249 with car movements associated with employees and visitors split across the A249 and the local road network reflecting the anticipated local nature of those journeys. Hence not all car journeys would use the A249 and this is reflected in the traffic figures stated in the TA. Once traffic enters the wider highways network, the traffic would distribute across the network and the impact at any location will in terms of both total numbers and as a proportion of baseline be less than that shown for the A249.
159. Cumulative assessment of the proposed development in combination with other committed or approved developments in the Port is provided in the Transport Assessment, with the developments T1 and/or W2 (as set out in paragraphs 5-7 above) included in that assessment. It is noted that the other developments referred are already approved or are permitted development, so cannot be controlled or restricted through the current planning application. However, as stated these developments were included in the TA and as such were taken into account by both National Highways and KCC Highways and Transportation in their assessment of the proposal and when assessed cumulatively with this proposal would not justify a refusal of the planning application on Highways terms.
160. While the proposed development would generate additional transport movements, these represent only a small increase in the context of existing traffic flows and are consistent with the current and future operation of the Port. The Port is well served by the strategic highways network with the Port entrance/exit directly onto the A249, and exists primarily for the purpose of import and export of goods and onwards distribution of these by road transport, the proposed development is considered in keeping with this established purpose.
161. The majority of additional vehicle journeys generated by the proposed development would be focused on the A249 and the onwards trunk road and motorway network to provide quick and efficient access to the wider region. Other than a small number of local car journeys generated by employees there is not expected to be any need or benefit for site traffic to use the local road network in and around Sheerness and surrounding towns and villages.

**Cement production plant capable of importing raw materials and processing up to 500,000 tonnes per annum of cement on land off Great Basin Road, Port of Sheerness, Isle of Sheppey, Kent ME12 1SW - SW/22/500629 (KCC/SW/0016/2022)**

---

162. Members will note the concerns noted above from the noise consultant regarding mitigating night-time noise impacts on the nearest residential receptors within the Port site (at the junction of Garrison Road and Main Road). In order to mitigate the potential impacts for these properties the applicant has agreed to a condition being imposed on any future planning permission requiring HGVs to use an alternative route to enter and exit the Port during night-time hours, which would see vehicles travelling north of the affected properties rather than directly passing them, the alternative route can be seen below in Figure 2 and on the plan on page C1.5, and limits on the vehicle numbers and restrictions on weekend operations.



**Figure 2**

163. KCC Highways and Transportation were consulted on the application and have commented that the application site would gain access onto the highway network through the Sheerness Docks main gate, which leads directly onto the A249 strategic road network which falls under the jurisdiction of National Highways. The bulk of raw materials would be delivered to the site via ship but the export of the cement product would be transported by road tanker via the A249 corridor, and this is not expected to route onto any part of Kent County Council's highway network within the immediate local area. As the impact would only be felt on the A249 corridor before dispersing out across the wider strategic network, it would therefore be appropriate for National Highways to consider the assessment of the traffic movements on their network.

**Cement production plant capable of importing raw materials and processing up to 500,000 tonnes per annum of cement on land off Great Basin Road, Port of Sheerness, Isle of Sheppey, Kent ME12 1SW - SW/22/500629 (KCC/SW/0016/2022)**

---

164. KCC Highways and Transportation further comment that it is only likely to be the employee movements that would route onto the local highways under KCC jurisdiction, and the TA identifies that once both phases of the development are operational, around 52 workers would be employed at the site working over two shifts. Census data identifies that 66% of employees would travel to work by private car, and with the shift pattern, this suggests that only 11 two-way vehicle trips would be generated in the peak hour by staff. The Census data also indicates that 72% are likely to originate from the Sheerness area, so minimal vehicle trips would route via Bridge Road and through Sheerness Town Centre. As such KCC Highways and Transportation have raised no objection subject to the imposition of a conditions to cover the following:
- Submission, and subsequent approval in writing, of a Construction Management Plan to include the following matters:
    - (a) Routing of construction and delivery vehicles to / from site
    - (b) Parking and turning areas for construction and delivery vehicles and site personnel
    - (c) Timing of deliveries
    - (d) Provision of wheel washing facilities
    - (e) Temporary traffic management / signage
  - Provision and permanent retention of the vehicle loading/unloading and turning facilities shown on the submitted plans prior to the use of the site commencing.
  - Provision and permanent retention of the vehicle parking spaces shown on the submitted plans prior to the use of the site commencing.
165. National Highways were also consulted on the application and comment that in relation to the operational phase of the development that there are no matters of concern and that the quantum of additional HGV and LGV movements along the A249 and the M2 would be low, and the peak demand would fall outside of network peak hours. However, they do recognise that there are potential adverse impacts during the construction phase which may be mitigated by means of the preparation, approval, and adherence to a Construction Management Plan. National Highway conclude that having assessed the proposed development that they are content that the proposals, if permitted, would not have an unacceptable impact on the safety, reliability, and/or operational efficiency of the Strategic Road Network in the vicinity of the site (A249 and M2), provided that the aforementioned condition is imposed on any future planning permission.
166. As a result of the advice from KCC Highways & Transportation and National Highways I must conclude that the proposed development is acceptable in highways terms and that a refusal of the proposed development could not be sustained in terms of highway safety and capacity having regard to tests outlined in paragraph 110-113 of the NPPF subject to the imposition of conditions to secure a Construction Management Plan, provision and permanent retention of vehicle loading/unloading, turning and vehicle parking facilities.
167. I note that objections have been received from the Borough, Town and Parish Councils and local residents about traffic issues as a result of the proposed development,

**Cement production plant capable of importing raw materials and processing up to 500,000 tonnes per annum of cement on land off Great Basin Road, Port of Sheerness, Isle of Sheppey, Kent ME12 1SW - SW/22/500629 (KCC/SW/0016/2022)**

---

however, as stated above during the assessment of the planning application and consultee responses received from KCC Highways & Transportation and National Highways, I am satisfied that there is no justification on highways grounds to warrant refusal of the application. Furthermore, Members should note that the Port benefits from wide ranging permitted development rights, examples of which are set out in paragraphs 5-7 above. These such developments, effectively have no limits on operational vehicle numbers. Whilst in planning terms for this development there is no justification for putting controls on vehicle numbers, it is noted that the applicant has voluntarily suggested that a limit is imposed for vehicle movements during night-time and weekend hours in order to mitigate any potential impact on the most affected residential receptors to the proposed development.

168. I am satisfied that the proposed development would not have an unacceptable impact on the highway network and would accord with the NPPF, Kent Minerals and Waste Local Plan 2013-30 (as amended by Early Partial Review) (Adopted September 2020) Policies CSM12, DM12, DM13, DM15 and Bearing Fruits 2031: The Swale Borough Local Plan (Adopted July 2017) Policies DM6, DM7, DM14 relating to highway and transport matters.

**Landscape and Visual Impact**

169. Policy DM2 of the Kent MWLP states that proposed developments will be required to ensure that there is no unacceptable adverse impact on the integrity, character, appearance and function of sites of international, national and local importance and Policy DM24 of the SLP states that the value, character and tranquillity of the Borough's landscapes will be protected, enhanced and, where appropriate, managed. A landscape and visual appraisal (LVA) was submitted with the application to assess potential effects on landscape character and visual amenity likely to arise from the introduction this new cement production plant. This LVA was reviewed by KCC's independent landscape specialist as part of the consultation process.
170. The site is situated at approximately 4m above ordnance datum (AOD) and the immediate surrounds are strongly influenced to the north, east and south by areas of vehicle storage and industrial features including large commercial buildings and silos associated with the operational Port, as well as utilities infrastructure. Four 125m wind turbines are located along the edge of the Port to the south and are prominent features in the surrounding landscape.
171. The A249 runs north-south approximately 270m to the east of the site beyond the main carriageway further pockets of land comprise car parks and industrial features, as well as the Festival Field public open space.
172. Approximately 2km to the south of the site lies the settlement of Queenborough. Across the estuary 1.5km to the west of the site lies the eastern shore of the Hoo Peninsula which predominantly comprises industrial areas around Wallend, with the small village settlement of the Isle of Grain further north along the coastal tip of the peninsula.

**Cement production plant capable of importing raw materials and processing up to 500,000 tonnes per annum of cement on land off Great Basin Road, Port of Sheerness, Isle of Sheppey, Kent ME12 1SW - SW/22/500629 (KCC/SW/0016/2022)**

---

173. While the proposed development would be located in the Port of Sheerness it does include a number of large buildings and tall structures up to 53m in height that have the potential to affect landscape character, views and visual amenity.
174. The site and the 5km study area fall within National Character Area (NCA) 81 Greater Thames Estuary. The site is not located within any nationally or locally designated landscapes, although there are local landscape designations within 2km of the site and the residential area within 0.6km. Notwithstanding this, the LVA has established that effects on landscape character, visual amenity and views are unlikely to be worthy of further consideration due to the following reasons.
- land use at the site is currently a vehicle storage area on land reclaimed from the sea;
  - no landscape features or elements of importance to the baseline would be lost as a result of construction of the proposed development;
  - the landscape at and adjacent to the site is industrial in character and the proposed development would not be uncharacteristic of the baseline, although it would introduce an array of different structures;
  - the proposed development would be set back from residential areas and low level screening by buildings and vegetation would mean that only upper parts of structures would be visible;
  - in longer distance and more elevated views the proposed development would be seen in the context of the adjacent port industrial area and would not be uncharacteristic of views; and
  - the wider context to views includes industrial areas at the Isle of Grain and port activities which are concentrated at the mouth of the Medway Estuary where the proposed development would be located.
175. The proposed development would result in noticeable localised change in an area where industrial development forms part of the baseline and where further development may be anticipated due to the Port being identified as a regeneration area in the Swale Local Plan. The LVA acknowledges that the proposed development would introduce a large facility into the landscape which would be a noticeable change to views in a localised area, however, the relatively low sensitivity of the immediate receiving environment contributes to the lower level of effects reported in the appraisal. The more sensitive areas such as the locally designated Area of High Landscape Value (AHLV) are separated from the proposed development by low lying landscapes with intervening urban and industrial development. Where elevated vistas are available, views provide a wider context to the proposed development and indicate it would be seen as part of the pattern of industrial development at the mouth of the Medway Estuary and, in that sense, would not be an uncharacteristic addition.
176. KCC's independent landscape consultant was consulted on the application and has confirmed that the potential landscape and visual effects arising from the proposed development would not give rise to an unacceptable level of impact in landscape terms. It has also confirmed that the submitted LVA is appropriate, and the methodology used is based on industry standard guidance, which is considered acceptable and that the appropriate planning policy considerations and the relevant policy and guidance were considered in the LVA. The LVA contains an appraisal of the

**Cement production plant capable of importing raw materials and processing up to 500,000 tonnes per annum of cement on land off Great Basin Road, Port of Sheerness, Isle of Sheppey, Kent ME12 1SW - SW/22/500629 (KCC/SW/0016/2022)**

---

effects on landscape character and effects on views and visual amenity. Baseline conditions were ascertained using expected and acceptable source material / information and understanding of landscape character was gained from a range of Landscape Character Assessment studies of different scales, ranging from National to Local, which is considered to be a thorough approach. The LVA set out the baseline conditions and provided appropriate and relevant details on the landscape baseline for the appraisal, including the setting, the landscape character (at a range of scales) and landscape designations that could be affected by the proposed development, as well as the visual baseline for the appraisal and the visual receptors at nine selected viewpoints.

177. A field study was also carried out, which is essential for a robust LVA, and Type 1 viewpoint photography was undertaken, which is in line with Landscape Institute Guidance. The study area was determined to be 5km which is appropriate. In addition, Zone of Theoretical Visibility (ZTV) modelling was carried out in conjunction with the assessment of actual visual extents determined from the field study. It was based on a screened model that indicates the likely screening effects from existing large blocks of woodland and buildings, rather than a bare earth model, which is regarded as more informative for both the purposes of LVA and for the understanding in planning terms. Key assumptions include the application of a precautionary principle and the assessment of a realistic worst-case scenario, e.g., effects on visual amenity were considered during winter months, which is in line with industry standards for the production of appropriate and effective LVAs.
178. The development would operate on occasion during hours of darkness and it would be necessary for lighting to be provided to illuminate the site, including in the vicinity of the eco hopper to be located on the wharf. Given the site's existing use as an area for the short-term storage of building materials and vehicles prior to import/export, it already benefits from floodlighting through a network of existing columns that illuminate the access roads. The application documents set out that alternative lighting would be proposed which would see a reduction in the overall level of luminance compared with the existing situation. It is not considered that there would be significant impact from the proposed lighting when considered against the wider Port activities, however, it is recommended that a condition requiring the submission of a scheme of lighting be imposed on any future planning permission.
179. Therefore, given no objections were received from KCC's independent landscape consultant following the assessment of an appropriate LVA, I am satisfied that the proposed development would not give rise to an unacceptable effect on any landscape related planning designations. Similarly, the proposed development would not give rise to unacceptable cumulative effects on landscape character. Overall, there is no reason why the landscape and visual effects arising from the proposed development should be regarded as unacceptable and I am satisfied that the Port is able to comfortably accommodate the proposed development in landscape terms. No objections have been received from technical consultees and on this basis, I would not raise any objections on landscape and visual amenity grounds subject to the submission of a scheme of lighting. I am satisfied therefore that the proposed development would be acceptable in landscape and visual impact terms and accords with the NPPF, Kent Minerals and Waste Local Plan 2013-30 (as amended by Early Partial Review)



**Cement production plant capable of importing raw materials and processing up to 500,000 tonnes per annum of cement on land off Great Basin Road, Port of Sheerness, Isle of Sheppey, Kent ME12 1SW - SW/22/500629 (KCC/SW/0016/2022)**

---

(Adopted September 2020) Policy DM2 and Bearing Fruits 2031: The Swale Borough Local Plan (Adopted July 2017) Policy DM24.

**Water Environment**

180. The NPPF states that permitted operations should not have unacceptable impacts on the natural environment or on the flow and quantity of surface and groundwater or give rise to contamination. Policy DM10 of the Kent MWLP states that permission will be granted where it does not result in the deterioration of physical state, water quality or ecological status of any waterbody (e.g. rivers, streams, lakes and ponds); have an unacceptable impact on groundwater Source Protection Zones; and exacerbate flood risk in areas prone to flooding and elsewhere, both now and in the future.
181. The applicant has submitted a Surface Water Drainage Statement that sets out the proposed approach to managing surface water flows, ensuring adequate control measures to mitigate flood risk to ensure that surface run-off is dealt with at source and any off-site flood risk is not increased. The statement sets out a number of possible SuDS measures that could be employed at the site and sets out the suitability for each of these methods. Given the existing site's impermeable nature, infiltration is not deemed as a feasible means of managing surface water and as such the proposed method would see surface water discharged to the River Medway via the existing outfall after passing through a treatment system. Attenuation storage would also be needed to temporarily store water during storm periods when run-off rates from the development would exceed the site's allowable discharge rate.
182. No objections or concerns have been raised by consultees, KCC's Flood Risk Project Officer has reviewed the Surface Water Drainage Statement submitted with the application and agrees in principle to the proposed development subject to the inclusion of a condition on any planning permission requiring the submission of a detailed sustainable surface water drainage scheme for the site that is based on the Surface Water Drainage Statement submitted with the application. It should demonstrate that the surface water generated by this development (for all rainfall durations and intensities up to and including the climate change adjusted critical 100 year storm) can be accommodated and disposed of without increase to flood risk on or off-site.
183. The drainage scheme to be submitted shall also demonstrate
- that silt and pollutants resulting from the site use can be adequately managed to ensure there is no pollution risk to receiving waters; and
  - appropriate operational, maintenance and access requirements for each drainage feature or SuDS component are adequately considered, including any proposed arrangements for future adoption by any public body or statutory undertaker.
184. Southern Water were consulted on the application and provided no objection subject to conditions that includes details of the proposed means of foul sewage and surface water disposal and to request that they be consulted on the details to be submitted in relation to the sustainable surface water drainage scheme set out above.

**Cement production plant capable of importing raw materials and processing up to 500,000 tonnes per annum of cement on land off Great Basin Road, Port of Sheerness, Isle of Sheppey, Kent ME12 1SW - SW/22/500629 (KCC/SW/0016/2022)**

---

185. In the absence of any objections from key technical consultees (e.g. the Environment Agency, KCC's Flood Risk Project Officer and Southern Water), I am satisfied that the development proposed by this application does not present an unacceptable risk to groundwater or surface water quality, would not exacerbate flood risk and therefore, accords with the NPPF, Kent Minerals and Waste Local Plan 2013-30 (as amended by Early Partial Review) (Adopted September 2020) Policy DM10 and Bearing Fruits 2031: The Swale Borough Local Plan (Adopted July 2017) Policy DM21 relating to the water environment.

**Ecology**

186. Paragraph 179 of the NPPF states that local plans should set out environmental criteria against which planning applications should be assessed to ensure that permitted operations do not have unacceptable impacts on the natural environment. Paragraph 180 states that regard should be given to such matters when determining planning applications and that the planning system should contribute to and enhance the natural and local environment by (amongst other things) minimising impacts on biodiversity and providing net gains in biodiversity where possible. Kent MWLP Policy DM3 requires proposals to ensure that they do not result in unacceptable adverse impacts on Kent's important biodiversity assets and demonstrate an adequate level of ecological assessment has been undertaken.

187. Objections have been received from local residents regarding the potential for ecological impacts as a result of the proposed development.

188. The Medway Estuary and Marshes Special Protection Area (SPA), Special Scientific Interest (SSSI) and Ramsar sites are opposite the site to the west alongside the Isle of Grain and the same designations are also located further to the south of the site. Approximately 4km to the southeast is the Swale SPA, SSSI and Ramsar sites.

189. As part of the application a Screening Report under the Conservation of Habitats and Species Regulations 2019 (as amended) ('The Habitat Regulations') was submitted which comprised HRA Stage 1 (screening) of the HRA process. Seven European designated sites fall within the potential Zone of Influence of the proposed development, including the Medway Estuary and Marshes Special Protection Area (SPA) and Ramsar site, the Thames Estuary and Marshes SPA and Ramsar site, the Outer Thames Estuary SPA, and the Swale SPA and Ramsar site. Consideration was given to the conservation objectives of the European designated sites and the reasons for their designation, as well as the project proposals and their sources of impact. This included an assessment of the potential for disturbance/displacement of species, pollution, habitat loss and fragmentation and the mortality/injury of species to occur as a result of the proposed development, during both its construction and operational phases. This also included the levels of noise and disturbance on the closest designated sites (Thames Estuary and Marshes SPA and Ramsar Site & Medway Estuary and Marshes SPA and Ramsar Site) and their special bird interest features.

190. The Screening Report concluded that due to the nature and relative small-scale of the proposed development and the associated identified impact pathways, that the development would result in "No Likely Significant Effects" upon any European designated sites, either alone or in combination with other consented or proposed

**Cement production plant capable of importing raw materials and processing up to 500,000 tonnes per annum of cement on land off Great Basin Road, Port of Sheerness, Isle of Sheppey, Kent ME12 1SW - SW/22/500629 (KCC/SW/0016/2022)**

---

plans or projects. On that basis Appropriate Assessment, which would be HRA Stage 2, would not be required and constraints in relation to European designated sites could be screened out as requiring further consideration, including any mitigation to avoid, reduce or offset likely significant effects.

191. The site is a previously developed area of hardstanding wholly within an operational port environment and in itself has little to no existing biodiversity potential and the proposed cement production plant would present very little opportunity to improve the biodiversity opportunities on the site. It is important though for consideration to be made of the potential for any impacts off site as result of the proposed development, particularly on the nearby designated sites and if any mitigation measures would be necessary. Following the initial round of consultations, the KCC Ecological Advice Service requested additional information to seek assurances that there would not be unacceptable impacts from the effects of noise, vibration and air quality on the designated sites within 5km of the development site, from both the operations of the cement production plant and from the vehicles exporting the finished product from the site. As a result of this consultation response, and others, the applicant provided revised noise and air quality assessments and an additional technical note that confirmed for the KCC Ecological Advice Service that the predicted noise levels from continuous operations of the facility would be identified as low with no discernible impulsive characteristics at 900-1000m from the site, thus having no impact on the designated sites in terms of noise and vibration. In terms of the impact of additional traffic movements when accounting for the modelled levels versus the assumed critical load, the small radius of effect and the nature of the habitats affected and their qualifying features, it was concluded that the additional traffic modelled in the revised assessments would be unlikely to present a significant adverse effect of the Swale or Medway designated sites or their qualifying features.
192. In terms of the potential impacts of the proposed development on ecological matters no objections or concerns have been raised by consultees. Natural England, the Environment Agency and KCC's Ecological Advice Service are satisfied that the development is unlikely to have any significant effect on any designated sites if it is undertaken as proposed and agreed with the HRA Screening Report conclusion that Appropriate Assessment would not be required. Notwithstanding the objections received from local residents I am satisfied the concerns raised are not sufficient to warrant a refusal of planning permission on ecological grounds. In the absence of any objections from key technical consultees, I am satisfied that the proposed development would be acceptable in terms of ecology and the natural environment and would therefore accord with the NPPF, Kent Minerals and Waste Local Plan 2013-30 (as amended by Early Partial Review) (Adopted September 2020) Policies DM2, DM3 and Bearing Fruits 2031: The Swale Borough Local Plan (Adopted July 2017) Policies DM24 and DM28 relating to designated sites and biodiversity matters.

**Heritage Matters**

193. Paragraph 190 of the NPPF states that plans should set out a positive strategy for the conservation and enjoyment of the historic environment, including heritage assets most at risk through neglect, decay or other threats and paragraph 194 states that in determining applications, local planning authorities should require an applicant to describe the significance of any heritage assets affected, including any contribution

**Cement production plant capable of importing raw materials and processing up to 500,000 tonnes per annum of cement on land off Great Basin Road, Port of Sheerness, Isle of Sheppey, Kent ME12 1SW - SW/22/500629 (KCC/SW/0016/2022)**

---

made by their setting. The level of detail should be proportionate to the assets' importance and no more than is sufficient to understand the potential impact of the proposal on their significance. Paragraph 197 states that in determining applications, local planning authorities should take account of the desirability of sustaining and enhancing the significance of heritage assets and putting them to viable uses consistent with their conservation. Policy DM5 of the Kent MWLP states that proposed developments should result in no unacceptable adverse impact on Kent's historic environment and Policy DM34 of the SLP states development will not be permitted which would adversely affect a Scheduled Monument and Policy Regen 3 (The Port of Sheerness: Regeneration Area) states that proposals involving the intensification of port use within existing port confines will be supported provided that the significance of heritage assets are sustained.

194. No objections or concerns have been raised by consultees including Historic England who were consulted given the proximity to Scheduled Ancient Monuments.
195. KCC's Conservation Officer was consulted on the application and commented that the Archaeological Desk-Based Assessment submitted with the application identified a number of designated historic assets within a study area of 1km radius from the boundary of the proposed site. These comprise the Sheerness: Royal Naval Dockyard and Bluetown Conservation Area, Sheerness Defences Scheduled Ancients Monuments (SAMs) and 31 Listed Buildings. KCC Archaeology were consulted on the application and no response was received, this is due to the site being made ground and the KCC Conservation Officer's response covering the relevant heritage issues.
196. All but two of the designated assets are located inside the Conservation Area, the 8 listed buildings located outside the dockyard boundary are screened by the Port boundary wall, some 6m in height of brick construction, which follows the line of the High Street as it extends northwards and then eastwards. Thus the majority of the designated structures in the 1km study area would not be intervisible from the development site, being either screened by the high street boundary wall or located behind other tall dockyard structures. The majority are located more than 450m away from the site.
197. The only historic structure within visual range of the development site is 'Building 26', a former working mast house. This is a Grade II\* listed 2-storey structure which had a variety of uses and dates from between 1823 and 1826. It is constructed of yellow brick with cast iron columns and an iron, multi-valley roof. It is the survivor of a pair of matching buildings constructed either side of a pond in which large timbers for ship's masts were stored. Although it survives in a substantially complete condition, the Conservation Officer highlights that Building 26 is in need of conservation work.
198. The dockyard area has developed organically over successive decades. Some historic buildings have been lost, but many important examples survive, standing side by side with modern warehouses and other industrial structures. As a result, the process of historical development of the dockyard area remains legible. The historic setting of Building 26, which stands just outside the Conservation Area boundary, has changed over time. Views of its south elevation are now partly obscured by two tall silos and large distribution warehouses located immediately to the southeast and approximately 100m to the southwest. Between these warehouses is an uninterrupted line of sight

**Cement production plant capable of importing raw materials and processing up to 500,000 tonnes per annum of cement on land off Great Basin Road, Port of Sheerness, Isle of Sheppey, Kent ME12 1SW - SW/22/500629 (KCC/SW/0016/2022)**

---

between Building 26 and the proposed site, a distance of some 420m. There is no direct line of sight between the site and the buildings within the Conservation Area due to the presence of other structures.

199. The proposed development would result in the construction of several large steel structures. The tallest of these being the pair of solos reaching a height of 53.3m. These structures would have a visually dominant effect on the area. At this height, the upper part of the silos would likely be distantly visible from some of the designated assets, however, the separation distance and the presence of other buildings in between would prevent this from occurring in the majority of cases. Despite the size and scale of the proposed cement works buildings, they are of similar design and concept to other modern industrial structures currently standing within the dockyard area. Although visually dominant, the proposed structures would be located sufficiently far from the existing historic assets for their immediate visual setting to remain unaffected.
200. The form and design of the proposed cement works structures would not mark a dramatic change in the pattern of development of the dockyard buildings. These have become progressively more industrial in nature over successive decades and many of which have been developed under the Port's wide reaching permitted development rights.
201. As such it is considered that the heritage impacts resulting from the proposed development would not justify a refusal of planning permission. The Conservation Officer sets out that the proposed development would be within a working port and many of the modern and historic buildings are industrial in nature. As such, the new structures would fit within the context of existing industrial and dockside activity in the area, rather than constituting a substantial change to the nature of the current setting. The size and scale of the proposed development means that its visual impact on the immediate area would be high, however, the level of harm conferred on the historic setting would be low, due to the physical separation of the site from other historic structures in the area. The level of harm to the current setting of Building 26, the only historic building within visual range, resulting from the development, would be less than substantial. Key views of Building 26 from its immediate vicinity (e.g. within 400m of the south elevation) would remain unaffected. Although distant views of the building would be affected, this would be mitigated by the fact that the proposed development would be appropriate to the industrial context of the area.
202. The Conservation Officer suggested that with regard to any profits resulting from the development that consideration should be given to channelling a percentage of these into a fund set up to conserve and repair key buildings within the dockyard area. Priority should be given to those Grade I and II\* listed structures in a poor state of repair, some of which may currently be included in Historic England's Heritage at Risk register. Whilst there is not justification in this application to compel the applicant to become involved in such a scheme, should Members agree, I would include an informative on any future planning permission requesting the applicant to give consideration to involving themselves in projects that seek to conserve and protect key buildings in the local area, particularly within the Port itself.

**Cement production plant capable of importing raw materials and processing up to 500,000 tonnes per annum of cement on land off Great Basin Road, Port of Sheerness, Isle of Sheppey, Kent ME12 1SW - SW/22/500629 (KCC/SW/0016/2022)**

---

203. Notwithstanding the objections received on heritage grounds, no objections have been received from consultees, including the KCC Conservation Officer and I am satisfied that this application would not have an overriding negative impact on any heritage assets, and it would accord with the NPPF, Kent Minerals and Waste Local Plan 2013-30 (as amended by Early Partial Review) (Adopted September 2020) Policy DM5 and Bearing Fruits 2031: The Swale Borough Local Plan (Adopted July 2017) Policies DM34 and Regen 3 relating to conservation and heritage assets.

**Conclusion**

204. The proposed development is for a cement production plant capable of importing raw materials and producing up to 500,000 tonnes per annum of cement which there is a clear and demonstrably increasing need for in Greater London and the wider South East of England. This under-supply of cement production in the region creates a reliance on importation from elsewhere in the UK and from overseas which is not a sustainable or an economically sound approach to sourcing cement.
205. The proposed development would make productive use of available land and berthing facilities within the Port of Sheerness, supporting the Port's long-term objectives in line with the requirements of the NPPF. Furthermore, importing clinker by ship directly into the site avoids the economic and carbon cost of transporting it long distances by road and the potential benefit of exporting the finished product by barge to regional markets is significant.
206. Overall, I accept the applicant's assessment of the potential impacts from noise, air quality and on highways matters as summarised above, and that subject to the inclusion of the aforementioned conditions potential negative impacts as a result of these matters would be satisfactorily mitigated.
207. Landscape & visual impacts, water environment and heritage impacts upon the site and surrounding areas as a result of the proposed development are considered to be minimal with appropriate mitigation secured through planning conditions.
208. Ecology impacts upon the site and surrounding area as a result of the development are considered to be minimal and it is noted that the KCC Ecological Advisory Service and Natural England agreed with the conclusion of the Habitats Regulations HRA Screening Report that Appropriate Assessment would not be required.
209. There have been no objections received from technical consultees and the proposed cement works would be subject to pollution control considerations through the environmental permitting regime administered by the Port of London Authority in conjunction with Swale Borough Council.
210. It is not considered there would be any cumulative or combined impacts associated with other developments that would be sufficient to presume against the grant of planning permission.
211. Paragraphs 7 – 14 of the NPPF sets out national policy on achieving sustainable development, including the three overarching objectives (economic, social and

**Cement production plant capable of importing raw materials and processing up to 500,000 tonnes per annum of cement on land off Great Basin Road, Port of Sheerness, Isle of Sheppey, Kent ME12 1SW - SW/22/500629 (KCC/SW/0016/2022)**

---

environmental), which are interdependent and need to be pursued in mutually supportive ways. The presumption in favour of sustainable development means approving development proposals that accord with an up-to-date development plan without delay.

212. Paragraph 81 of the NPPF states that planning decisions should help create the conditions in which businesses can invest, expand and adapt. Significant weight should be placed on the need to support economic growth and productivity, considering both local business needs and wider opportunities for development.
213. I am satisfied the proposed development complies in all relevant aspects with the NPPF to which the presumption in favour sustainable development applies. The proposed development provides a sustainable way to manage recycled aggregates and provide additional capacity for secondary aggregate production in accordance with Policy CSM8 of the Kent MWLP. Thus, it is concluded that the proposals comply with the adopted Kent Minerals and Waste Local Plan 2013-30 (as amended by the Early Partial Review) (September 2020) and the relevant policies of the Bearing Fruits 2031: The Swale Borough Local Plan (Adopted July 2017).
214. Therefore, I am satisfied that the proposed development would be in accordance with the general aims and objectives of the relevant Development Plan Policies, and I am satisfied for the reasons outlined above that there are no material planning reasons for refusing the application. I therefore recommend accordingly.

**Recommendation**

215. I RECOMMEND that PERMISSION BE GRANTED, SUBJECT TO:

(i) conditions covering amongst other matters:

1. Development to be commenced within 3 years of the date of the permission.
2. Carrying out the development in accordance with the submitted plans.
3. Submission and approval in writing of a Construction Management Plan prior to commencement of development
4. Submission and approval in writing of a lighting scheme.
5. Construction hours only between 07:00 and 18:00 hours Monday to Friday and between 07:30 and 13:00 hours on Saturdays (with none on Sundays, Bank and Public Holidays), unless otherwise approved by the County Planning Authority.
6. Overnight HGV vehicle movements between 18:00 - 06:00 will only be permitted on a maximum of one night-time period per calendar month and must not exceed 8 such movements in the period. Such movements will only occur on weekdays and not at all in the period after 6pm on a Saturday until 6am on a Monday.
7. All vehicles arriving or leaving the site in the 12 hour period between 6pm and 6am will utilise the alternative route to avoid passing the most sensitive properties on Garrison Road, as shown on the approved plan.
8. Before commencement on site, a Construction Dust Management Plan is to be submitted to and approved in writing by the County Planning Authority. This is to be prepared in accordance with the Institute of Air Quality Management 'Guidance on the assessment of dust from demolition and construction'.

**Cement production plant capable of importing raw materials and processing up to 500,000 tonnes per annum of cement on land off Great Basin Road, Port of Sheerness, Isle of Sheppey, Kent ME12 1SW - SW/22/500629 (KCC/SW/0016/2022)**

---

9. Before commencement of operations on site, a Dust and Particulate Monitoring Plan is to be submitted to and approved in writing by the County Planning Authority. The purpose of monitoring is to ensure that dust and particulate emissions from the site are managed effectively to avoid causing exceedances of ambient air quality standards and disamenity, and that dust and particulate matter from the site does not contain heavy metals such as chromium. The plan is to include action trigger levels for dust and airborne particulate matter, and site management procedure to investigate any exceedances of these trigger levels and put in place remedial measures in a timely manner.
10. Before commencement of operations on site, an airborne particulate monitoring system is to be established and maintained for the lifetime of the development to enable real-time measurements and alert the operator of the site to events that exceed trigger levels, which are to be set out in the Dust and Particulate Monitoring Plan.
11. The rating level of noise from all operations, including ship deliveries and on-site vehicle movements, shall not exceed the following limits determined using BS 4142:2014+A1:2019. This would impose limits of 39 dB during the day, 36 dB during the night at locations MP1, 2 and 3 and 34 dB during the night at MP4 and 5. The submission, approval and implementation of a mitigation scheme the event that noise limits were to be exceeded.
12. Requirement for the operator to carry out noise monitoring and recording upon completion and operation of Phase 1, and upon completion and operation of Phase 2, with the County Planning Authority able to review these results as necessary to ensure compliance with the noise limits in place.
13. Submission and approval in writing of a Noise Management Plan to include measures including, but not limited to, staff training, ship unloading procedures, use of klaxons, use of broad band reversing alarms for on-site mobile plant, use of horns, and containment of certain operations.
14. Commencement of operations is to be implemented to align with the delivery by Southern Water of any sewerage network reinforcement required to ensure that adequate wastewater network capacity is available to adequately drain the development.
15. Development shall not begin in any phase until a detailed sustainable surface water drainage scheme for the site has been submitted to and approved in writing by the County Planning Authority and thereafter implemented as approved.
16. No building on any phase (or within an agreed implementation schedule) of the development hereby permitted shall be occupied until a Verification Report, pertaining to the surface water drainage system and prepared by a suitably competent person, has been submitted and approved in writing by the County Planning Authority and thereafter implemented as approved.
17. If, during development, contamination not previously identified is found to be present at the site then no further development (unless otherwise agreed in writing with the County Planning Authority) shall be carried out until a remediation strategy detailing how this contamination will be dealt with has been submitted to and approved in writing by the County Planning Authority. The remediation strategy shall be implemented as approved.
18. No infiltration of surface water drainage into the ground is permitted other than with the written consent of the County Planning Authority. The development shall be carried out in accordance with the approved details.



**Item C1**

**Cement production plant capable of importing raw materials and processing up to 500,000 tonnes per annum of cement on land off Great Basin Road, Port of Sheerness, Isle of Sheppey, Kent ME12 1SW - SW/22/500629 (KCC/SW/0016/2022)**

---

(ii) informatives covering the following matters:

1. Standard Environment Agency informatives relating to drainage/pollution control methods/contamination/waste management.
2. The applicant is advised that they should give consideration to becoming involved in projects that seek to conserve and protect key buildings in the local area, particularly within the Port itself.

Case Officer: Adam Tomaszewski
--------------------------------

Tel. no: 03000 410434
-----------------------

Background Documents: see section heading
---