

20230668 Eastcourt Marshes Electricity Substation

Port of London Authority 19 July 2023

Thank you for consulting the Port of London Authority (PLA) on the above-mentioned request for a screening opinion in accordance with the Town and Country Planning Act (Environmental Impact Assessment) Regulations 2017 in respect of the proposed development at Eastcourt Marshes Electricity Substation, Mark Lane, Gravesend. I have now had the opportunity to review the submitted Environmental Screening Report and have the following comments to make.

The proposed development relates to one new shaft headhouse and one new cable sealing end compound in Gravesend as one element of the TKRE Cable Tunnel Replacement Project. The project relates to a new bored tunnel under the River Thames constructed to house new cross linked polyethylene (XLPE) cables with associated new infrastructure proposed either side of the River Thames in Tilbury and Gravesend. On the tunnel itself table 2.1 (New Bored Cable Tunnel – Summary of Key Characteristics) states that the depth of the tunnel will be approximately 50m with a width of 4m. This will unlikely affect the river channel above it. However if for any reason the proposed depth cannot be achieved or maintained then the PLA must be reconsulted to establish that the Tidal Thames remains unaffected.

The potential construction effects section (paragraph 3.8.16) states that there is the potential for construction to affect human and controlled waters receptors and for the ground conditions to impact on the design of the proposed development. Potential impacts listed include possible dewatering of the tunnel or the spoil during construction, and the discharge of water from dewatering to surface watercourses. To note if any new outfall to the tidal Thames is required as part of the works a River Works Licence (RWL) will be required with the PLA and the PLA's Statutory Consents and Compliance Team should be contacted at lic.app@pla.co.uk. Further information on this will be required in the forthcoming Drainage Strategy as part of any forthcoming planning application.

A key issue highlighted in the report is the requirement for the permanent disposal of the material/spoil removed from the tunnel during construction. Within the report it is highlighted that it is the applicant's preference that tunnel spoil will be removed by barge on the River Thames to reduce the number of HGVs on the wider road network, and that this will be reviewed further as part of the Environmental Appraisal Report (EAR). Paragraphs 2.3.12 and 3.9.29 of the report also state that some discussion has been held with the RSPB with regard to using excavated material in the formation of wetlands at RSPB Cliffe Pools to contribute to the creation of new habitat, or to support other habitat restoration and wetland projects in the Tilbury area. In principle this preference is supported. Paragraph 3.2.1 also states that it is the applicant's preference to remove the tunnel spoil from the construction site at Tilbury to and from existing jetty structures only. As part of the forthcoming planning application further detail will be required on this preference within the EAR, as well as the Transport Assessment and Construction Environmental Management Plan (CEMP) particularly with regard to maximising the use of the river as part of the construction stage, rather than by road. This should include details on any communication with operators/owners of existing river structures that may be utilised for the proposed development and any implications of barge

movements on marine traffic. Furthermore it is noted in paragraph 3.7.12 that potential vessel emissions will also be considered in the forthcoming Air Quality Assessment, this is supported.

On other environmental matters, within the noise and vibration chapter it is noted that this does not specifically consider non-human sensitive receptors. Given the location in relation to various European designated sites it is considered that this must be addressed as part of the forthcoming planning application. It is noted that there are references elsewhere in the report on noise, for example paragraph 3.2.26 on underwater sound disturbance effects to marine mammals and fish, states that based on information available at this stage the applicant considers it unlikely that the proposed activities will generate sufficient underwater sound to exceed ambient levels - however, once full design details are available the impact pathway will be subject to further assessment to confirm that this. The PLA in principle support this approach.

Table 3.1 (Key Ecological Receptors) outlines the geographical scale of biodiversity for various receptors. Within this table the following amendments are required:

- Wintering and wading birds: As these are designated features of the Thames Estuary and Marshes Ramsar and Special Protection Area (SPA), it is considered that this would make them of international importance
- Breeding birds: As these are designated features of the associated Site of Special Scientific importance (SSSI), it is considered that this would make them of national importance

In addition to highlight that the most significant issue relating to birds is that of disturbance because of construction activities, including any potential effects of the noise and vibrations tunnelling activities on underwater feeding waterfowl and marine mammals. This must form a key consideration in the Habitats Regulations Assessment (HRA) as part of the forthcoming planning application. Furthermore to note that depending on the location, any mitigation/compensation identified in the HRA may have additional implications for the PLA.

Finally paragraphs 2.3.38 – 2.3.39 include some information on the decommissioning of existing assets, stating that decommissioning of the existing tunnel and associated infrastructure does not form part of this project. However the report also states that it is expected that the existing cables and cable joints within the existing tunnel will be purged of their oil and sent for recycling and that further tunnel inspection work will be required to assess this. To confirm the PLA consider that, if the existing tunnel is no longer going to be used, the existing tunnel and infrastructure should be removed from the river bed.