

North Kent Marshes Internal Drainage Board
13 Conqueror Court
Sittingbourne
Kent ME10 5BH

Telephone 01795 468000
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Our reference: GR/20231313

Your reference: 20231313

04/09/2024

Dear Sir/Madam

Application Reference: 20231313

Proposal: Proposed construction of a new cable tunnel beneath the River Thames between Gravesend and Tilbury to provide additional transmission capacity. Above-ground infrastructure in the form of a new Cable Sealing End compound and a new head house building along with associated electricity infrastructure, access, parking, boundary treatment, and two overhead gantry structures for future overhead lines. Temporary compound for the duration of the project to provide parking, staff welfare facilities, delivery vehicle parking, and equipment and machinery storage, including boundary treatment and lighting.

Location: Eastcourt Marshes Electricity Distribution Site Mark Lane Gravesend Kent DA12 2HN

Thank you for your consultation on the above-referenced planning application.

The site is within the North Kent Marshes Internal Drainage Board's district; however, this development has been comprehensively reviewed by the Environment Agency and Kent County Council acting as Lead Local Flood Authority (LLFA), and some of the latest submissions are in direct response to these authorities' previous comments. As such, the Board has very little to add other than it would be prudent to condition any permission to ensure no development takes place prior to a detailed drainage scheme being submitted to and approved by the LPA together with details of the scheme's operation and maintenance and it should be verified on-site once completed by a competent engineer and prior to operation.

Furthermore, the LPA may wish to consider a planning condition to ensure a site-specific Flood Risk Assessment addressing construction/temporary works, including emergency response measures for construction activities in flood risk areas is submitted to and approved by the LPA. In addition, a drainage management strategy should be included for the construction phase that addresses the temporary drainage design including construction water management and protection of watercourses during the works.

The submission states that discharge consents will be required for surface water discharges from the Environment Agency, Essex County Council (Tilbury), and Kent County Council (Gravesend), however, the Board would like to take this opportunity to reiterate that, land drainage consent is required from the Board for the discharge of surface water into the Board's district in line with the Board's Byelaws (specifically Byelaw 3 available at <https://lowermedwayidb.co.uk/wp->

[content/uploads/2023/02/NKMIDB_Byelaws_DEFRA-approved.pdf](#)). Any consent granted will likely be conditional, and a Surface Water Development Contribution fee is normally required to cover the increased flow and volume in its maintained drainage network. However, this application is proposing to discharge to 'main river' and it is then only a short distance before the discharge will reach the tidal Thames as such, it seems unlikely that the Board will require such a payment.

This response has been provided using the best knowledge and information submitted as part of the planning application at the time of responding and is reliant on the accuracy of that information. The Board would be very grateful if its comments were used in their entirety.

Yours faithfully,



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