



National Highways Planning Response (NHPR 24-02) Formal Recommendation to an Application for Planning Permission

From: Christine Allen, Regional Director
Operations Directorate
South East Region
National Highways
planningSE@nationalhighways.co.uk

To: Gravesham Borough Council (FAO Rebecca Harrison)
planning.reps@gravesham.gov.uk

CC: transportplanning@dft.gov.uk
spatialplanning@nationalhighways.co.uk

Council's Reference: 20231313

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

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

National Highways Ref: NH/24/04823

Referring to the consultation on a planning application dated 30 January 2024 referenced above, in the vicinity of the A2 that forms part of the Strategic Road Network, notice is hereby given that National Highways' formal recommendation is that we:

- ~~a) offer no objection (see reasons at Annex A);~~
- b) recommend that conditions should be attached to any planning permission that may be granted (see Annex A – National Highways recommended Planning Conditions & reasons);**

~~c) recommend that planning permission not be granted for a specified period (see reasons at Annex A);~~

~~d) recommend that the application be refused (see reasons at Annex A)~~

Highways Act 1980 Section 175B is not relevant to this application.¹

This represents National Highways' formal recommendation and is copied to the Department for Transport as per the terms of our Licence.

Should the Local Planning Authority not propose to determine the application in accordance with this recommendation they are required to consult the Secretary of State for Transport, as set out in the [Town and Country Planning \(Development Affecting Trunk Roads\) Direction 2018](#), via transportplanning@dft.gov.uk and may not determine the application until the consultation process is complete.

The Local Planning Authority must also copy any consultation under the 2018 Direction to planningse@nationalhighways.co.uk.

Signature:



Date: 20 August 2024

Name: Nigel De Wit

Position:
Assistant Spatial Planner
National Highways

National Highways

Bridge House, 1 Walnut Tree Close, Guildford GU1 4LZ
planningSE@nationalhighways.co.uk

¹ Where relevant, further information will be provided within Annex A.

Annex A **National Highways' assessment of the proposed development**

National Highways has been appointed by the Secretary of State for Transport as a strategic highway company under the provisions of the Infrastructure Act 2015 and is the highway authority, traffic authority and street authority for the Strategic Road Network (SRN). The SRN is a critical national asset and as such we work to ensure that it operates and is managed in the public interest, both in respect of current activities and needs as well as in providing effective stewardship of its long-term operation and integrity.

Recommend that conditions should be attached to any planning permission that may be granted: Reasons

We will be concerned with proposals that have the potential to impact on the safe and efficient operation of the SRN, in this case, particularly within the vicinity of the A2.

We have reviewed the submitted information and have concluded that the proposal would not have a material impact on the SRN.

Lower Thames Crossing

We note that the construction programme would overlap that for the Lower Thames Crossing (LTC) and the project teams for LTC and National Grid are already working together to identify and work through project interfaces so that both projects are managed appropriately. We encourage further discussion between the project teams to ensure they can be delivered successfully. The final Construction Traffic Management Plan should be informed by and take account of the construction strategy for the LTC when there is a prospect of the construction phases for both projects overlapping.

Construction Traffic Management Plan

We have noted and reviewed the updated Construction Traffic Management Plan (CTMP) (July 2024) which was uploaded to the planning application webpage on 14 August 2024. The final version of the CTMP, addressing the matter of the construction strategy for the LTC, will need to be prepared, agreed and implemented prior to work commencing.

Planning application to Thurrock Council ref: 23/01502/FUL

We are mindful that this strategic proposal impacts on two local planning authority areas: Gravesham Borough Council and Thurrock Council. This response is to the planning application made to Gravesham Borough Council (ref: 20231313). We are responding separately to the application made to Thurrock Council.

Having assessed application 20231313, we are content that the proposal, 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 (A2) provided that the following condition is imposed, reflecting DfT Circular 01/2022 and NPPF 2023 paras. 114-117:

1. Construction Traffic Management Plan

Condition: Prior to the commencement of the development hereby permitted a comprehensive Construction Traffic Management Plan shall be submitted to and approved in writing by the Local Planning Authority (in consultation with the Highway Authority for the A2). The plan shall include as a minimum:

- Construction phasing
- Construction routing plans
- Permitted construction traffic arrival and departure times.

Thereafter all construction activity in respect of the development shall be undertaken in full accordance with such approved details unless otherwise approved in writing by the Local Planning Authority in consultation with the Highway Authority.

Reason: To mitigate any adverse impact from the development on the A2 in accordance with DfT Circular 01/2022.

Standing advice to the local planning authority

The Climate Change Committee's [2022 Report to Parliament](#) notes that for the UK to achieve net zero carbon status by 2050, action is needed to support a modal shift away from car travel. The NPPF supports this position, with paragraphs 74 and 109 prescribing that significant development should offer a genuine choice of transport modes, while paragraphs 108 and 114 advise that appropriate opportunities to promote walking, cycling and public transport should be taken up.

Moreover, the build clever and build efficiently criteria as set out in clause 6.1.4 of [PAS2080](#) promote the use of low carbon materials and products, innovative design solutions and construction methods to minimise resource consumption.

These considerations should be weighed alongside any relevant Local Plan policies to ensure that planning decisions are in line with the necessary transition to net zero carbon.