

Delegated Report

Approval of Details Application

Application no:	20250697
Location:	Eastcourt Marshes Electricity Substation Mark Lane Gravesend Kent
Description:	Application for approval of condition 6 attached to planning permission reference number 20231313 relating to a comprehensive Construction Traffic Management Plan.
Applicant:	National Grid Electricity Transmission PLC
Site Visit Date:	N/A

Planning permission was granted under application ref. 20231313 on 4 March 2025 for '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'.

This was subject to a number of conditions including condition 6 which states:

6. *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). The plan shall include as a minimum:*
- a. routing of construction and delivery vehicles to and from site,*
 - b. parking and turning areas for construction and delivery vehicles and site personnel,*
 - c. timing of deliveries,*
 - d. wheel washing facilities,*
 - e. temporary traffic management/signage,*
 - f. a pre-condition survey of the local roads to be used,*
 - g. a Sustainable Travel Plan to reduce the number of employees traveling by private car and parking in nearby public roads,*
 - h. timings of HGV movements to cause minimum disruption,*
 - i. liaison with the Lower Thames Crossing Team,*
 - j. loading/unloading areas within the site compound,*
 - k. waiting areas to avoid conflicting HGV movements,*
 - l. particularly on the Thames and Medway Canal Road;*
 - m. safe pedestrian access to the site;*
 - n. the impact on highway trees and shrubs of the abnormal loads,*
 - o. construction phasing,*
 - p. construction routing plans and*
 - q. 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.

The reason for the condition is to ensure the development would have no adverse impact to the safe and free flow of traffic on the highway network in accordance with Policy CS11 of the Gravesham Local Plan Core Strategy (2014) and section 9 of the National Planning Policy Framework (2024).

Consultations

KCC Highways & Transportation Services

I am pleased to note that a Construction Management Plan (CMP) has been submitted, which includes all the information requested prior approval. The information provided is satisfactory and I have no objection to Condition 6, Construction Traffic Management Plan being discharged.

KCC Biodiversity

We have been consulted on them discharge of condition 6. However, it is our understanding that it is related to the construction traffic management plan. This condition does not appear to be relevant to biodiversity matters and so we have no comment to make. Please let us know if we have missed anything.

National Highways

We have reviewed the Construction Traffic Management Plan provided in support of this application, and we have no objection to this condition being discharged.

Natural England

Natural England is not able to provide specific advice on this application and therefore has no comment to make on its details. Although we have not been able to assess the potential impacts of this proposal on statutory nature conservation sites or protected landscapes, we offer the further advice and references to Standing Advice.

Environment Agency

This application relates to condition 6 that was not requested by us, we therefore have no comments to make with regards to the discharge condition 6.

GBC – Environmental Protection

The reason for this condition is 'To ensure the development would have no adverse impact to the safe and free flow of traffic on the highway network.....'. This does not fall within Environmental Protections remit, therefore there are no comments to make.

Analysis

The information submitted in pursuance condition 6 is:

- Cover Letter;
- Application form; and
- Construction Traffic Management Plan.

The Construction Traffic Management Plan is a comprehensive document which covers all key elements of how the development will seek to minimise impact on the highway network as demonstrated by the sections within the Construction Traffic Management Plan such as the following:

4	CONSTRUCTION PROGRAMME & TRAFFIC MANAGEMENT	14
4.1	Overview	14
4.2	Construction Hours and Delivery Times	14
4.3	Construction Workers	15
4.4	Shaft Excavation	15
4.5	Summary of HGV Movements	15

5	VEHICLE MANAGEMENT MEASURES	17
5.1	Overview	17
5.2	Driver Information Packs	17
5.3	Traffic Management Measures	17
5.4	Site Access Control	17
5.5	HGV Emissions	17
5.6	Parking & Loading	18
5.7	Road Safety	18
5.8	Road Condition Surveys	18
5.9	Wheel Washing	18
5.10	Tipper Covers	19
5.11	Vehicle Identification	19
5.12	Pedestrian Access Routes	19
5.13	Public Right of Way (PRow) Diversion	19
5.14	Interface with local Stakeholders	19

Kent Highways, National Highways and Gravesham Environmental Protection have been consulted and raise no issues with the Construction Traffic Management Plan.

The document demonstrates the impact on the highway network and users of the highway network have been carefully considered to minimise the impact of the development during the construction phase.

It should be noted that one objection has been received which raises the following concerns

1. *The application should make clear how and when the new overhead lines will be put up, without disruption to the training functions at the MPSTC.*
2. *The need for a commitment to repairing Mark Lane before and after the construction takes place.*
3. *The need for confirmation that Mark Lane will have marshals to ensure that MPS vehicles have priority over construction traffic and to ensure constant safe access is maintained.*
4. *Consideration is needed as to the combined impacts of the Lower Thames Crossing and the proposed works, unless more certainty can be provided that the two developments would not happen simultaneously.*
5. *The application should make clear what levels of EMR employees at the MPSTC would be subject to and the basis on which this would be safe.*

The above concerns were put to the applicant who have provided a response on 4th September 2025 which adequately addresses 3rd party concerns as shown below.

MPS Comment Topic	MPS Comment Detail	Our Response
Overhead Line Alterations	The application should make clear how and when the new overhead lines will be put up, without disruption to the training functions at the MPSTC.	The Overhead Line team have targeted the works for August in order to minimise the impact to training functions. When dates are confirmed, we will continue to work closely with the MPSTC to coordinate our works and minimise disruption.
Road repairs	The need for a commitment to repairing Mark Lane before and after the construction takes place.	In preparation for the works, National Grid's appointed contractor has undertaken a condition survey of the lane, and will maintain it to ensure that, at completion of the works, any degradation of the lane due to project use is rectified.
MPS priority	The need for confirmation that Mark Lane will have marshals to ensure that MPS vehicles have priority over construction traffic and to ensure constant safe access is maintained.	We can confirm that traffic marshals will be stationed on Mark Lane. In the event that the police need to egress their site to respond to an emergency, they will be able to contact the FBJV at the construction site, who will be in ready contact with the traffic marshals. Any project related vehicles will be held from entering Mark Lane (either from the public highway or from the site ends) until such a point that the police vehicles have exited the lane. The police will be provided with up-to-date

MPS Comment Topic	MPS Comment Detail	Our Response
		contact details for the site for use in order to trigger this protocol.
Cumulative impacts	Consideration is needed as to the combined impacts of the Lower Thames Crossing and the proposed works, unless more certainty can be provided that the two developments would not happen simultaneously.	The project notes that consideration of cumulative effects between the construction of the project and the construction of LTC formed a part of the original planning submission. The project team undertakes regular liaison activities with the LTC.
Electric and Magnetic Fields	The application should make clear what levels of EMR employees at the MPSTC would be subject to and the basis on which this would be safe.	The UK has a carefully thought-out set of policies for protecting against Electric and Magnetic Fields (EMFs), the main component of which is exposure limits. These policies are set out in National Policy Statement (NPS) EN-5 along with associated Codes of Practice which set out the conditions under which calculations of compliance are performed. Calculations on the proposed changes to the overhead line have been performed according to the provisions in the Code of Practice; the maximum calculated electric and magnetic fields across Milton Rifle Range are 6.3 kV/m for electric fields and 50.4 µT for magnetic fields. These calculations are performed at minimum design clearance of the conductors to ground and 100% continuous power rating, so represent a worst case. On any typical day the EMFs will be significantly lower. The public EMF exposure limits as detail in NPS EN-5 are 9 kV/m and 360 µT. In addition, there are occupational exposure limits that are significantly higher than the public limits. Ensuring compliance with the public limits will always guarantee compliance with the occupational ones. The overhead line will fully be compliant with these policies and exposure limits, set to protect everyone.

As highlighted by the applicant this is only a discharge of condition 6 (Construction Traffic Management Plan) and the issue surrounding Electric and Magnetic Fields were considered during the original planning approval. Furthermore, the cumulative impact of the development was considered during the determine of the application and cannot be revisited when discharging conditions.

Conclusion

It is considered that sufficient details have been submitted and condition 6 attached to planning permission reference number 20231313 relating to a comprehensive Construction Traffic Management Plan. There is no conflict with the development plan.

Recommendation: Discharge Condition 6.

See draft Decision

Case Officer:	Richard Hart	Team Leader:	Mrs Faye Walsh
Signed:		Signed:	
Dated:	8th September 2025	Dated:	08 September 2025