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Port of London Authority response (DC 635) Plan ref: 23/01502/FUL cable tunnel beneath the River Thames

Dear Nina

Thank you for consulting the Port of London Authority (PLA) on the application referenced above, for the proposed construction of a new cable tunnel beneath the River Thames between Tilbury and Gravesend to provide additional transmission capacity. I have now had the opportunity to review the submitted documents and have the following comments to make.

Within the application documents the depth of the proposed tunnel is proposed to be approximately -34m Above ordnance Datum (AoD) to - 32mAoD, and approximately three to four tunnel widths below the river bed. The diameter of the tunnel is proposed to be 4m in internal diameter (4.5m external diameter) and the depth of the drive tunnel shaft is expected to be approximately 42.5m. To confirm the PLA has no in principle concern with the proposed depth of the proposed tunnel as part of this development although it is requested whether the applicant could provide some further information with regard to the depth of the existing tunnel and a comparison with the depth of the proposed tunnel, and the reason for any significant difference. It is also noted that as part of the development no works are required in the marine environment of the river itself with regard to the tunnel works.

With regard to transport, section 5.5 of the submitted Outline Construction Traffic Management Plan (OCTMP) states that the spoil is planned for removal from both Gravesend and Tilbury sites, by which a number of methods could be utilised including:

- Removal by barge (via River Thames) – Tilbury only; and,
- Removal by road – Tilbury and Gravesend.

For Tilbury specifically, two options are described within the application documents with regard to river use.

- the OCTMP and Environmental Statement (ES) state that the use of the Port of Tilbury via berth 5 is being investigated and could be utilised which based on a 1,000m³ tonne barge could result in 86 barges being utilised as part of the development.
- Within the ES there is also an option to utilise the existing and working jetty to the south-east of the proposed Tilbury SEC, delivering the tunnel and Tilbury shaft spoil to the jetty via HGV and transferring to barge. There is an existing road extending to the jetty, however the application states that some upgrading of the existing road will be required. As part of this option there may also be a requirement to carry out enabling works at the jetty itself. If so this will need to be considered as part of a River Works Licence application with the PLA. Within the ES it is also stated that there will be no requirement to use the jetty or berth during weekend or night-time hours, as spoil from the 24 hour tunnelling will be stored in the muck away areas (see Figure 3-5) overnight and during the weekend and therefore the jetty will not require additional lighting during night-time hours. To highlight as part of this option it is likely that a Navigational Risk Assessment (NRA) to consider the use of this jetty.

In principle the use of the Tidal Thames is welcomed, and this must continue to be robustly considered, including for the delivery of materials as well as removal of spoil and be specifically highlighted within a appropriately worded condition for a detailed Construction Traffic Management Plan as part of any forthcoming planning permission. This would be in line with Local Plan policy PMD11 (Freight Movement) as the application states that the use of the Thames could result in approximately 11,440 HGV movements being taken off the roads and onto the river.

With regard to these works to highlight this will require a River Works Licence with the PLA. This must be added as an informative as part of any forthcoming planning permission and the PLA's Statutory Consents and Compliance Team contacted at lic.app@pla.co.uk. It is welcomed that this requirement is recognised in the submitted Construction Environmental Management Plan (CEMP) in table 7-1 (Required Consents and Licenses).

Furthermore, with regard to the excavation of spoil, it is noted that National Grid are exploring opportunities to transport the spoil to habitat enhancement projects in the local vicinity such as the RSPB site at Cliffe Pools which would provide benefits to aquatic invertebrates and wading birds. This is in principle welcomed

particularly with regard to linking river movements. As an alternative the RSPB owned and Land & Water operated site at Rainham Marshes may also be an option for the disposal of spoil. It is therefore considered that this opportunity continues to be investigated and this should also be highlighted within a relevant planning condition as part of any forthcoming planning permission.

Lastly it is noted that the decommissioning of the existing tunnel and associated infrastructure does not form part of this application / project. To confirm the PLA must be consulted on this aspect of the overall development once further details are available.

Regards



Michael Atkins
Senior Planning Officer
Port of London Authority