



Gravesham Borough Council

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Highways and Transportation

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Tel: 03000 418181

Date: 30 August 2024

Our Ref:

Application - GB/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.

Thank you for your consultation in relation to the above planning application. I have the following comments to make with respect to highway matters :-

I note that the applicant has now submitted revised Highway Impact Assessment and Construction Traffic Management Plans since my previous consultation response dated 28th February 2024 in which I raised no objection but recommended a Condition in respect of the CTMP being submitted before any work commences. This is still the case although I would like to note that I still have concerns about the outline CTMP submitted that would need to be addressed in the full document when it is submitted:

- Section 5.2 has changed slightly. Added in some paragraphs including two more bullet points stating “*TBM and tunnelling hours: 24-hrs per day / 7-days per week*” and “*Deliveries: 08:00 – 18:00 Monday to Friday (with exception of TBM)*”. It should be clear that deliveries should be undertaken outside of the peak hours. A table has been added showing shift patterns. As well as still stating 40 employees for the Gravesend site, it also states “*Tilbury and Gravesend – 30 no. staff [per shaft] for the shaft construction*”, so is there 70 in total?
- Section 5.7. The Shaft and tunnel construction movements appear to have reduced quite a lot although it is not clear as to whether this is in Gravesham, or all in Tilbury (4922 two way movements over 8 months to 2468). However, whilst table 5.4 is set out differently to the previous version, it looks like the traffic in Gravesham is slightly reduced overall, but that doesn't include staff. Figure 5.4 'Gravesend – needs clarification
- Section 8 (page 57 of the PDF) is the Framework Construction Worker Travel Plan.

- 8.3 describes walking, cycling and public transport to the site, but only for Tilbury! What about Gravesend? The Full CTMP needs to include Gravesend.
 - A temporary car park will be provided at both sites and “*Construction staff parking at these sites will be monitored, controlled and recorded to ensure that single occupancy car use is minimised*”. Doesn't say how or what will be done. No details of temporary car park at Gravesend.
 - It says “*The Contractor would be encouraged to provide minibuses /coaches for transporting construction staff between the temporary car park (or local train stations) and the site*”. ‘Encouraged’ is not a commitment but should be re-worded to make it such.
 - Section 8.6 ‘Targets’ doesn't actually have a target! There should be a proposed % reduction (usually 10% but could be different for construction workers) from the predicted traffic generation figures. It should at least state the predicted car based flows in the Travel Plan section and say there is a target to reduce them.
 - The Full CTMP needs more detail on how numbers will be monitored and what remedial measures will be put into place if targets are breached.
- The full CTMP should include tracking?
 - Nothing is said about possibly having to remove the traffic lights at the Ordnance Rd junction.

It is important to note that Local Planning Authority (LPA) permission does not convey any approval to carry out works on or affecting the public highway.

Any changes to or affecting the public highway in Kent require the formal agreement of the Highway Authority, Kent County Council (KCC), and it should not be assumed that this will be given because LPA planning permission has been granted.

For this reason, anyone considering works which may affect the public highway, including any highway-owned street furniture or landscape assets such as grass, shrubs and trees, is advised to engage with KCC Highways and Transportation at an early stage in the design process.

Across the county there are pieces of land next to private homes and gardens and near the highway that do not look like roads or pavements but are actually part of the public highway.

Some of this highway land is owned by Kent County Council whilst some is owned by third party owners. Irrespective of the ownership, this land may have ‘highway rights’ over the topsoil.

Works on private land may also affect the public highway. These include works to cellars, to retaining walls which support the highway or land above the highway, and to balconies, signs or other structures which project over the highway. Such works also require the approval of the Highway Authority.

Kent County Council has now introduced a pre-application advice service in addition to a full formal technical approval process for new or altered highway assets, with the aim of improving future maintainability. Further details are available on our website below:

<https://www.kent.gov.uk/roads-and-travel/highway-permits-and-licences/highways-permissions-and-technical-guidance>.

This process applies to all development works affecting the public highway other than applications for vehicle crossings, which are covered by a separate approval process. Further details on this are available on our website below:

<https://www.kent.gov.uk/roads-and-travel/highway-permits-and-licences/apply-for-a-dropped-kerb/dropped-kerb-contractor-information>

Once planning approval for any development has been granted by the LPA, it is the responsibility of the applicant to ensure that before development commences, all necessary highway approvals and consents have been obtained, and that the limits of the highway boundary have been clearly established, since failure to do so may result in enforcement action being taken by the Highway Authority.

The applicant must also ensure that the details shown on the approved plans agree in every aspect with those approved under the relevant legislation and common law. It is therefore important for the applicant to contact KCC Highways and Transportation to progress this aspect of the works prior to commencement on site.

Further guidance for applicants, including information about how to clarify the highway boundary and links to application forms for vehicular crossings and other highway matters, may be found on Kent County Council's website:

<https://www.kent.gov.uk/roads-and-travel/highway-permits-and-licences/highways-permissions-and-technical-guidance>. Alternatively, KCC Highways and Transportation may be contacted by telephone: 03000 418181.

Yours Faithfully

Director of Highways & Transportation

*This is a statutory technical response on behalf of KCC as Highway Authority. If you wish to make representations in relation to highways matters associated with the planning application under consideration, please make these directly to the Planning Authority.