

Rebecca Harrison
Planning Department
Gravesham Borough Council
Civic Centre
Windmill Street
Gravesend
Kent DA12 1AU

15th July 2025

Sent by e-mail: planning.reps@gravesham.gov.uk

Dear Ms Harrison

Eastcourt Marshes Electricity Distribution Site, Mark Lane, Gravesend, Kent Condition Discharge Application Reference: 20250697

On behalf of our client the Metropolitan Police Service (MPS), we write to submit an objection to the above condition discharge application. The application site includes part of the Metropolitan Police Specialist Training Centre (MPSTC), located at Mark Lane, Gravesend.

Background to the Metropolitan Police Specialist Training Centre

The application site includes part of a specialist firearms and public order training facility, used by the MPS and other UK national police forces. It is therefore a site of not only London wide security and safety importance, but also of National importance.

National Planning Policy Context

Police stations and policing facilities are protected under the terms of paragraph 101 of the National Planning Policy Framework. This states that:

"Planning policies and decisions should promote public safety and take into account wider security and defence requirements by:

a) anticipating and addressing possible malicious threats and natural hazards, especially in locations where large numbers of people are expected to congregate. Policies for relevant areas (such as town centre and regeneration frameworks), and the layout and design of developments, should be informed by the most up-to-date information available from the police and other agencies about the nature of potential threats and their implications. This includes appropriate and proportionate steps that can be taken to reduce vulnerability, increase resilience and ensure public safety and security; and

b) recognising and supporting development required for operational defence and security purposes, and ensuring that operational sites are not affected adversely by the impact of other development proposed in the area."

This representation sets out objections that will need to be addressed by the applicants in order to comply with this paragraph of the National Planning Policy Framework. In particular, section (b), where it states that operational sites must not be adversely impacted by other development proposed.

Knight Frank
55 Baker Street, London, W1U 8AN
+44 20 7629 8171

knightfrank.co.uk

Knight Frank is the trading name of Knight Frank LLP. Knight Frank LLP is a limited liability partnership registered in England and Wales with registered number OC305934. Our registered office is at 55 Baker Street, London W1U 8AN where you may look at a list of members' names. If we use the term 'partner' when referring to one of our representatives, that person will either be a member, employee, worker or consultant of Knight Frank LLP and not a partner in a partnership.

Impacts of Installing the Proposed Diverted Overhead Power Lines

The proposed development involves diverting existing overhead power lines. As part of this, new overhead lines are proposed over a Met Police firing range. The firing range is used to provide specialist training that is of National importance. MPS is concerned that this use will be disrupted by the proposed development. The Construction Method Statement provides no details of:

- When access will be needed.
- Whether this will conflict with MPS use of the MPSTC site.
- How this will impact National training requirements for policing.
- How access will be agreed.
- The methodology for any works within the MPS site boundary.

MPS believe that the Construction Method Statement should clearly set out these details.

National Grid have indicated that the overhead lines could be put up either at weekends, or other days when the shooting range is not operational. If this is the case, then this should be stated in the Construction Method Statement and subject to an appropriate planning condition to ensure compliance.

Access Road

The MPSTC requires constant access via Mark Lane. The road is in very poor condition. MPS questions whether the road is in sufficiently good condition to safely accommodate the proposed construction traffic. We believe that the Construction Method Statement should contain provisions for this to be dealt with before construction commences.

The Construction Method Statement should also require that the road condition is addressed once again after construction has taken place.

National Grid have indicated verbally that MPSTC vehicles would be unobstructed throughout the construction and would have priority over construction traffic. However, no mention of this is made in the Construction Method Statement. The Construction Method Statement should commit to this and this should be subject to a planning condition.

The Construction Method Statement does not appear to commit as to whether marshals would be used to ensure constant and safe access and egress down Mark Lane. MPS believes that the Construction Method Statement should commit to this and this should be subject to a planning condition.

Potential Overlaps between Lower Thames Crossing and National Grid Construction Periods

We understand that National Grid believe that the Lower Thames Crossing development would not commence development until after the National Grid works are complete. The Construction Method Statement does not appear to consider the impact if both projects were to proceed simultaneously. This is a particular concern in relation to the access road. MPS believes that the application should either address the impact of both projects happening simultaneously, unless more certainty can be provided that the two projects would not happen simultaneously.

Electric and Magnetic Radiation (EMR)

MPS employ staff who would work under the proposed overhead power lines on a daily basis. The Construction Method Statement does not confirm what level of EMR would be associated with the proposed overhead power lines or whether it would be safe for staff. We understand that National Grid may have considered impacts on users of the nearby footpath, but this is not the same as staff permanently employed under the lines. We therefore believe that National Grid should supply this information as part of the Construction Method Statement and if any mitigation is necessary as a result, this should be subject to a planning condition.

Content of the Construction Method Statement

The draft Construction Management Plan does not appear to address the above issues, which were set out as representations to the original Construction Method Statement for these works. We believe that the Construction Management Plan must be amended to address the issues raised, before it is approved.

Summary

The National Planning Policy Framework places a requirement on the National Grid to demonstrate that there would be no undue impacts on the Metropolitan Police Specialist Training Facility. The Construction Method Statement requires further details and commitments from National Grid in order to achieve compliance with this requirement. Accordingly, MPS objects to the condition discharge application, until such time as the concerns raised have been addressed.

MPS's concerns relate to the following issues:-

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.

We would be grateful if you could keep us informed on the progress of the application and any response from the applicants to the issues raised.

Yours sincerely

