

Delegated Report

Planning Application

Planning Application No: 20250902

Location: Eastcourt Marshes Electricity Substation Mark Lane Gravesend Kent

Description: Application for the approval of condition 22 (Piling/Penetrative Ground Improvement Methods) attached to planning reference number 20231313.

Applicant: National Grid Electricity Transmission PLC

Submitted Documents/Plans

Application form;
Covering Letter;
Gravesend Shaft Piling Risk Assessment – August 2025;
Groundwater Monitoring Plan;
Gravesend Shaft Groundwater Risk Assessment - August 2025; and
Gravesend Groundwater Monitoring and Mitigation Plan – July 2025.

Relevant Planning History

20231313 - 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. **Permitted 04.03.2025**

Development Plan

Gravesham Local Plan Core Strategy (2014)

- CS01 – Sustainable Development
- CS02 – Scale & Distribution of Development
- CS12 – Green Infrastructure
- CS18 – Climate Change
- CS19 – Development & Design Principles

Paragraph 34 of the NPPF (2024) sets out that policies within adopted local plans should be reviewed to assess whether they need updating at least once every five years, and should then be updated as necessary. Such reviews are also a legal requirement as set out in Regulation 10A of the Town and Country Planning (Local Planning) England Regulations 2012.

The Council undertook such a review in September 2019 and found that the adopted Local Plan Core Strategy is in need of a partial review in terms of Policy CS02, due to the increased need for housing since

the Local Plan Core Strategy was adopted and the need to ensure that a sufficient land supply exists to meet this need. Whilst saved policies from the Local Plan 1st Review (1994) generally conform with the NPPF (2024), the Council will also seek to replace these.

National Planning Policy Framework (2024)

- Section 2 – Achieving Sustainable Development
- Section 11 – Making effective use of land
- Section 15 - Conserving and enhancing the natural environment

Consultations, Publicity and Representations

Consultees

*Full comments are available on Public Access

Environment Agency (30th September 2025)

We have no **objection** to the discharge of condition 22.

The additional information provided, including email correspondence, has confirmed that piling works will be covered by groundwater monitoring as part of a programme that will be implemented for the wider project. They have also confirmed that the ground improvement grouts planned to be used only contain materials already assessed in previous risk assessments. This has therefore addressed our previous queries, and we have no further objections to the discharge of this condition.

Please note that our comments are based on the details available to us at the time of writing. If any subsequent changes are made to the application, please reconsult us.

Environment Agency (30th September 2025)

Overall, the submitted Assessments and their recommendations are considered suitable for the proposed works.

We have two specific points to make that are not covered satisfactorily within the Piling Risk Assessment. These are presented here in the interests of completeness, but please note that we have already raised these points directly with the contractors in a pre-application meeting and have received positive commitments from those parties to address our points.

Reasons

1. The submitted Piling Risk Assessment makes no firm recommendation nor commitment to carrying out groundwater monitoring during works. This is only recorded in scenario PS3 as a mitigation to be considered". We note from discussions direct with the contractors that in fact the project works will be carrying out comprehensive groundwater monitoring before, during and after all relevant construction works (not just during piling). Therefore, this shortcoming in the report has been superseded by the wider project commitments. An accompanying note or revision to the Piling Risk Assessment itself should be considered to reflect this for the planning approval submission.

2. Lack of information on the potential for use of resins, polymers or other 'contingency' additives to the expected grout and cement mixes used in construction. There is suitable groundwater risk assessment on the cement and bentonite grouts themselves but not included the possible (perhaps 'unplanned') use of additional polymers, resins or the like. Though this does not affect our acceptance in principle, we have agreed with the contractor that they will need to provide further information to confirm what, if any, additional contingency fluids/additives may be required, and provide any relevant information (including MSDS, but possibly more) for our further review. Again, submission of a covering note should be considered if required to be included in this submission.

Overcoming our objection

The applicant should make good on the necessary mitigations to address points 1 and 2 set out above before we can recommend the discharge of condition 22.

Officer's Analysis

Condition 22 - Piling/Penetrative Ground Improvement Methods

Piling and tunnel shaft construction using penetrative methods shall not be permitted other than with the express written consent of the Local Planning Authority, which may be given for those parts of the site where it has been demonstrated that there is no resultant unacceptable risk to groundwater. The development shall be carried out in accordance with the approved details.

Reason: Piling or other penetrative ground improvement methods can increase the risk to the water environment by introducing preferential pathways for the movement of contamination into the underlying aquifer and/or impacting surface water quality therefore to avoid any harm to the water environment in accordance with Policy CS19 of the Gravesham Local Plan Core Strategy (2014) and section 15 of the National Planning Policy Framework (2024).

The following information has been submitted

Application form;

Covering Letter;

Gravesend Shaft Piling Risk Assessment – August 2025;

Gravesend Shaft Groundwater Risk Assessment - August 2025; and

Gravesend Groundwater Monitoring and Mitigation Plan – July 2025.

Initially the e-mail raised an objection to discharging condition 22 for two reasons:

1. The submitted Piling Risk Assessment makes no firm recommendation nor commitment to carrying out groundwater monitoring during works.
2. Lack of information on the potential for use of resins, polymers or other 'contingency' additives to the expected grout and cement mixes used in construction

The applicant engaged directly with the EA and confirmed that both of the above would be undertaken. For the avoidance of doubt the additional information was the Groundwater Monitoring Plan. As a result of this document the EA confirmed on 30th September 2025 they have no objection to discharging condition 22 and there is no conflict with local and national planning policy.

Recommendation

Discharge Condition 22

(For detailed informatives, see draft Decision)

Case Officer:	Mr Richard Hart	Team Leader:	Mr Shazad Ghani
Signed:	<i>R Hart</i>	Signed:	<i>S.Ghani</i>
Dated:	13th November 2025	Dated:	20th November 2025