



National Highways Planning Response (NHPR 22-12) Formal Recommendation to an Application for Planning Permission

From: Christine Allen, Regional Director
Operations Directorate
South East Region
National Highways
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To: Gravesham Borough Council (FAO Ms R Harrison)
planning.reps@gravesham.gov.uk

CC: transportplanning@dft.gov.uk
spatialplanning@nationalhighways.co.uk

Council's Reference: 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

National Highways Ref: NH/24/04823

Referring to the consultation on a planning application dated 30 January 2024 referenced above, in the vicinity of the A2 that forms part of the Strategic Road Network, notice is hereby given that National Highways' formal recommendation is that we:

- ~~a) offer no objection (see reasons at Annex A);~~
- ~~b) recommend that conditions should be attached to any planning permission that may be granted (see Annex A — National Highways recommended Planning Conditions & reasons);~~

c) **recommend that planning permission not be granted for a specified period (see reasons at Annex A);**

~~d) recommend that the application be refused (see reasons at Annex A)~~

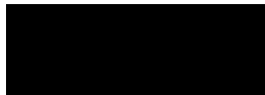
Highways Act 1980 Section 175B is not relevant to this application.¹

This represents National Highways' formal recommendation and is copied to the Department for Transport as per the terms of our Licence.

Should the Local Planning Authority not propose to determine the application in accordance with this recommendation they are required to consult the Secretary of State for Transport, as set out in the [Town and Country Planning \(Development Affecting Trunk Roads\) Direction 2018](#), via transportplanning@dft.gov.uk and may not determine the application until the consultation process is complete.

The Local Planning Authority must also copy any consultation under the 2018 Direction to planningse@nationalhighways.co.uk.

Signature:



Date: 19 February 2024

Name: Nigel De Wit

Position:

Assistant Spatial Planner
National Highways

National Highways

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¹ Where relevant, further information will be provided within Annex A.

Annex A **National Highways' assessment of the proposed development**

National Highways has been appointed by the Secretary of State for Transport as a strategic highway company under the provisions of the Infrastructure Act 2015 and is the highway authority, traffic authority and street authority for the Strategic Road Network (SRN). The SRN is a critical national asset and as such we work to ensure that it operates and is managed in the public interest, both in respect of current activities and needs as well as in providing effective stewardship of its long-term operation and integrity.

Recommend that planning permission not be granted for a specified period:

Reasons

It is recommended that the application should not be approved until **20 May 2024**.

We will be concerned with proposals that have the potential to impact on the safe and efficient operation of the SRN, in this case, particularly within the vicinity of the A2 at Gravesend.

Planning application to Thurrock Council ref: 23/01502/FUL

We are mindful that this strategic proposal impacts on two local planning authority areas: Gravesham Borough Council and Thurrock Council. As such, National Highways needs to ensure its responses to these applications are co-ordinated and consistent.

Our response to the application to Thurrock Council (ref: 23/01502/FUL) dated 15 February 2024 recommends that planning permission not be granted for a period of three months until 15 May 2024. This is to allow time for the applicant to provide additional information on the likely impacts of construction traffic on the SRN, including a Framework Construction Workforce Travel Plan (CWTP).

Until such time that this additional information has been submitted by the applicant to Thurrock Council and assessed by National Highways and the impacts of the proposal on the SRN are clearly understood, we recommend that planning permission not be granted for 20231313.

Please note that this recommendation can be replaced, renewed, or reviewed during the three-month period, or at its end, dependent on progress made with regards to the outstanding matters.

Lower Thames Crossing

We note that the construction programme would overlap with that for Lower Thames Crossing (LTC) and the project teams for LTC and National Grid are already working together to identify and work through project interfaces so that both projects are managed appropriately. We encourage further discussion between the projects to ensure they can be delivered successfully.

Next Steps

We recommend that a call is arranged between the applicant and National Highways as soon as possible to further discuss the application and agree a way forward with the assessment. This could be a joint call to discuss assessment needs for both the north and south of the Thames elements of the project.

Standing advice to the local planning authority

The Climate Change Committee's [2022 Report to Parliament](#) notes that for the UK to achieve net zero carbon status by 2050, action is needed to support a modal shift away from car travel. The NPPF supports this position, with paragraphs 74 and 109 prescribing that significant development should offer a genuine choice of transport modes, while paragraphs 108 and 114 advise that appropriate opportunities to promote walking, cycling and public transport should be taken up.

Moreover, the build clever and build efficiently criteria as set out in clause 6.1.4 of [PAS2080](#) promote the use of low carbon materials and products, innovative design solutions and construction methods to minimise resource consumption.

These considerations should be weighed alongside any relevant Local Plan policies to ensure that planning decisions are in line with the necessary transition to net zero carbon.