



Gravesham Borough Council

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Highways and Transportation

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TN24 8XU

Tel: 03000 418181

Date: 28 February 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 :-

This application was supported by a large number of documents, some of which are relevant to the highway impact of the proposal in Gravesham District. These documents are considered to be robust and include the following:

- ES Volume IV Chapter 18 Traffic and Transport – Gravesend
- ES Volume VI Appendix 10.1 Outline Construction Traffic Management Plan
- ES Volume VI Appendix 18.6 Preliminary Highway Impact Assessment (Gravesend)
- ES Volume VI Appendix 18.5 Construction Worker Trip Distribution (Gravesend)
- ES Volume VI Appendix 18.4 Baseline Traffic Movements (Gravesend)
- ES Volume VI Appendix 18.2 Transport Scoping Meeting Minutes – Gravesend
- ES Volume VI Appendix 18.1: Transport Statement Note – Gravesend

This proposal was subject to pre-applications discussions with KCC Highways at which a number of issues were discussed and included in the submitted documents.

It should be noted that the Thames and Medway Canal Road is not a public highway maintained by Kent Highways and, whilst there are concerns regarding the use of this narrow road by HGVs, it is not of concern to the Local Highway Authority but would need to be managed by the owners – Network Rail.

The level of traffic generated by the proposal during construction stage is not considered to be significant and during the following operational stage very low and of no concern.

The level of HGV movements to and from the site is managed in a Construction Traffic Management Plan which has been submitted in outline form and a Condition should be applied to any consent granted that a full CTMP should be submitted and approved by the LPA prior to any works commencing. It is essential that a detailed condition survey of the roads to be used to access the site is undertaken before any works commence, and that a Sustainable Travel Plan is included in the CTMP to minimise the number of employees traveling by private car and parking in the nearby roads which are already heavily parked in some places. Other issues that should be included in the CTMP (but not exclusively) are the timings of HGV movements to cause minimum disruption; liaison with the Lower Thames Crossing Team; loading / unloading areas within the site compound; waiting areas to avoid conflicting HGV movements, particularly on the Thames and Medway Canal Road; safe pedestrian access to the site; the impact on highway trees and shrubs of the abnormal loads.

I therefore raise no objection on highway grounds to this proposal provided the following Conditions are applied to any consent granted:

- 1 The applicant shall submit and obtain approval to a full Construction Traffic Management Plan to the LPA prior to any works commencing. Such a CTMP shall include a pre-condition survey of the local roads to be used, and a Sustainable Travel Plan to reduce the number of employees traveling by private car and parking in nearby public roads.

Informative: It is important to note that planning 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 a given because planning permission has been granted. For this reason, anyone considering works which may affect the public highway, including any highway-owned street furniture, 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 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 formal technical approval process for new or altered highway assets, with the aim of improving future maintainability. 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.

Should the development be approved by the Planning Authority, it is the responsibility of the applicant to ensure, before the development is commenced, that 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.

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.