

Gravesham Borough Council
Development Control
Civic Centre Windmill Street
Gravesend
Kent
DA12 1AU

Our ref: KT/2022/129861/03-L01
Your ref: 20220733
Date: 27 January 2023

Dear Planning Team,

The Installation Of Two Additional Bitumen Tanks, Load Out Gantry And The Installation Of A Bitumen Emulsion Plant And Alternative Car Parking.

FM Conway, Imperial Wharf, Clifton Marine Parade, Gravesend, Kent, DA11 0DY

Thank you for consulting us on the above application. **We maintain our objection based on a requirement for an increased offset between the proposed development and the tidal Thames flood defences.**

Flood Defences

The applicant has provided a scheme for raising the flood defences to the 2040 crest level as stated within the Thames Estuary 2100 Plan. However, as the applicant does not include a proposal for the raising of the defence to the 2070 level, sufficient space must be guarded to allow for these future works. It should be noted that the site is only viable due to the tidal defences, their continued maintenance and raising to account for the impacts of climate change.

It is understood that there is development within 16 metres, but we seek to avoid a worsening of the current situation.

Overcoming Our Objection

The 'Imperial Wharf Flood Defence Kerb Design' (reference: 317181, revision: P01, revision dated: 18/11/2022) should include proposed crest heights to confirm that 2040 raising requirements would be met.

Please submit drawings showing how the bitumen line interacts with the tidal flood defence. These should also detail how the flood the 2040 raising would be carried out and integrated with the existing river wall.

We would request a condition to be include requiring the repair works listed in the 'Structural Inspection Report' to be carried out as part of any development of this site which was granted planning permission.

Informative- Flood Risk Activity Permit (FRAP)

The Environmental Permitting (England and Wales) Regulations 2016 require a permit to be obtained for any activities which will take place:

- on or within 8 metres of a main river (16 metres if tidal)
- on or within 8 metres of a flood defence structure or culvert (16 metres if tidal)
- on or within 16 metres of a sea defence
- involving quarrying or excavation within 16 metres of any main river, flood defence (including a remote defence) or culvert
- in a floodplain more than 8 metres from the river bank, culvert or flood defence structure (16 metres if it's a tidal main river) and you don't already have planning permission.

Please be aware that the Tidal Thames Defences are likely to incorporate buried elements which may extend further inland than the above ground river wall.

For further guidance please visit <https://www.gov.uk/guidance/flood-risk-activities-environmental-permits> or contact our National Customer Contact Centre on 03702 422 549. The applicant should not assume that a permit will automatically be forthcoming once planning permission has been granted, and we advise them to consult with us at the earliest opportunity.

In preparation for the required Flood Risk Activity Permit, we would require the application to be supported by a method statements. This must detail what construction activities would be carried out within 16 metres of the tidal flood defences.

Please do not hesitate to contact us should you require any further information.

Yours faithfully

Ms Laura Edwards

Planning Advisor

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