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Sent: 26 April 2024 11:35:46 UTC+01:00
To: "Planning Admin" <planning.admin@gravesham.gov.uk>
Subject: 20240149 - LV21 - St Andrews Gardens (DC357)

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FAO: Kelly Joyce

Kelly,

Thank you for your email and letter received on 8 April 2024 concerning the Change of use of river to Use Class F1 to facilitate the permanent mooring of a vessel(s) at LV21, St Andrews Quay, Royal Pier Road.

The PLA and the Applicant have been in discussions for some time now about this site and the PLA has no objection to the permanent mooring of LV21 at the application site. There does however need to be much more clarity around what is proposed in application 20240149 before a decision can be made on it. This is because the application appears to seek not only consent for the permanent mooring of LV21 but potentially other vessels and potentially the moving of LV21. None of this appears to have been assessed in the application.

The red line box as drawn is very wide extending some 31.6m into the river which could result in four vessels the size of LV21 being moored at this location. Whilst it is noted the planning statement refers to facilitating a second vessel, the description of the development 'the permanent mooring of a vessel(s)' does not limit itself to two vessels. And if only two vessels are proposed it is unclear why such a large red line mooring box is required.

No details are provided on factors such as access – if a second vessel was moored on the outside of LV21 what access arrangements would there be, how would the necessary power, water etc be provided to that vessel, what numbers of people might access each vessel each day?

The use class is also fairly broad. Whilst LV21 has a cultural and heritage focus which forms part of GBC's overall regeneration strategy for Gravesend, the proposed use clause is Class F1 – Learning and non-residential institutions so could extend outside of a cultural and heritage offer and be as an example a school. No assessment has been undertaken of the implication of this.

As set out in the planning statement there are no fixed opening times for LV21 – whilst this might be acceptable for LV21 on its own, the cumulative impacts of multiple vessels with no fixed opening times has not been assessed in terms of issue such as noise and lighting.

Harbour Master

- Vessels moored within the red line box will take the ground at low water – has the applicant determined this is safe? Will the applicant be treating this effectively as a NAABSA berth, and implementing a program of surveys and inspections to ensure vessels can safely rest aground here?
- If LV21 will be moved along the wall and/or additional vessels moored, has applicant considered safe ship-shore access?
- Has any consideration been given to the navigational or other implications associated with the change of use including interference with the safe and efficient use of Town Pier / Gravesend Pontoon or display of lights deleterious to safe navigation.

Environment

It is difficult to comment on the implications of an additional vessel(s) without knowing the details. In terms of environmental considerations, the following need to be considered:

1. A WFD assessment may be required depending on the details of the mooring of the second vessel (if they are planning to install a mooring or other related structures)
2. A method statement including consideration of environmental risks/control measures relating to pollution prevention, waste management.
3. The consideration of options for biodiversity net gain.
4. The foreshore is a priority habitat and therefore protection of it should be included in the method statement – vessels will sit on the foreshore at low tide.

Conservancy

The applicant should at least consider the implications to river regime by drawing on examples from elsewhere.

We have arranged a meeting with the applicant to talk through these points in more detail.

Regards
Lucy

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CLEAN THAMES PLAN

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A CLEAN THAMES (2024-2030)**



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