

Planning Statement

Port of London Authority Port Control Centre Redevelopment

Section 73 application

April 2025

1. Introduction

1.1: This planning statement has been prepared in support of a Section 73 application ('s.73 application') to vary planning permission ref. 20221294 granted on the 20th April 2023 by the Port of London Authority (PLA).

1.2: This application is made under Section 73 to amend the conditions attached to the extant permission for development previously granted on this site. The affected planning condition is condition 2 (Approved Drawings and Documents). Varying this condition will enable the associated plans, with specific regard to the external landscaping proposals to be amended.

1.3: This statement sits alongside a set of associated documents (see Appendix 1) that have been prepared by the PLA, in accordance with Gravesham Borough Councils latest Validation Checklist.

1.4: This statement draws together the planning case for change, to set out the PLA's view that the proposed development is not fundamentally different to the extant consent and demonstrates a significant degree of compliance with the policies of the adopted Local Plan.

1.5: A sperate, new Listed Building Consent application has also been submitted, to reflect the amendments and supersede the current Listed Building Consent permission (Ref; 20221295)

2. Overview

2.1: Since planning consent was granted in April 2023, the detailed design of the proposals, with specific regard to the external landscaping has been further developed based on several factors which have necessitated the requirement of this Section 73 application:

- ***Protection of existing trees***

2.2: The principal reason for the proposed amendments to the external landscaping proposals are as a result of further detail bring gained around the Root Protection Areas (RPAs) of the existing trees lining Royal Pier Road, situated outside of the redline boundary and also outside the PLAs Ownership.

2.3: These trees were referred to within the consented Design and Access Statement, which in page 58 stated that all existing trees will be retained in the design and during the construction of the building and landscape.

2.4: An assessment of the consented proposals alongside the existing trees shows that the current proposals would cause root severance which would harm the trees and could lead to tree instability, with resulting potential health and safety risks as well as negative impacts being caused on the Gravesend Riverside Conservation Area.

2.5: The design of the landscaping has therefore been reviewed, to ensure that existing trees are protected, whilst also retaining the key design concepts of the development to:

- Unify the buildings across the PLA site and providing hierarchy across the estate
- Provide inclusive level access to London River House and the Port Control Centre
- Improve the setting of the Grade II Listed Royal Terrace Pier.

2.6: The amended landscaping proposals, as shown in the amended Design and Access Statement (April 2025) and the 'Port of London Port Control Centre landscaping statement' (April 2025) show how this has been achieved.

- ***Retention of existing car parking spaces – improving disabled access***

2.7: As highlighted in the associated Transport Statement addendum, due to the decision to avoid negatively impacting existing trees as part of the implementation of the landscaping enhancements, it has been considered appropriate and beneficial to retain a number of existing parking spaces in front of London River House for two principal reasons.

2.8: Firstly to ensure there is excellent, accessible disabled parking bays for disabled staff and visitors to the PLA complex. On review of the proposals the existing disabled access parking areas, located within the undercroft of London River House, is not considered appropriate, or welcoming for disabled users, who currently once parked would have had to take a separate, longer route to access PLA reception and the Port Control Centre. With the decision to not undertake works that may negatively impact on the existing tree root protection areas, it is considered an additional benefit to retain accessible parking for disabled visitors who can then fully access and make use of the amended landscaping area to allow this to become more inclusive.

2.9: Secondly this will allow for the retention of appropriate accessible parking areas for deliveries to the PLA, to ensure that delivery vehicles do not park directly on Royal Pier Road, potentially causing issues for local residents. Retaining delivery spaces here will enable delivery vehicles to park on PLA

premises without having to go through existing staff gates at the London River House and Alex House car parks, or for special arrangements to be made in advance for vehicles that may not be able to utilise a standard sized parking space in the existing car parks. Furthermore, to note the current permitted development did not propose to amend the existing access point for vehicles from Royal Pier Road here and this continues to remain as part of this amendment.

2.10: The retention of these existing parking spaces will not impact on the aims of the proposal, which will still achieve the aim to create a new landscape terrain that will redefine the PLAs relationship with the town and benefit both staff and visitors by unifying the disparate PLA buildings.

- ***Better integration of access ramps***

2.11: Given the opportunity to review the detail design of the landscaping proposals, taking into account the Root Protection Areas of the existing trees. A key benefit of the detailed design amendments has been with the repositioning of the access ramp, to provide a level access to London River House and the Port Control Centre that now takes up less space and allows for the retention of an existing, established grassed area that is situated some way from the new plaza/entrance area to the PLA.

2.12: This provides a cleaner, more streamlined entrance that presents an improved level access that is more centralised to the actual entrance to the PLA reception and Port Control Centre than the previous version, with the added benefit of retaining an existing grassed area which is of benefit to the frontage of the PLA complex.

2.13: It is for these reasons that the soft and hard landscaping design has been reviewed and amended. Related to this there are two associated planning conditions as part of the current consent relating to the hard and soft landscaping proposals (conditions 7 & 8) which are unchanged as a result of these amendments, and these will continue to be valid conditions that will need to be discharged at the appropriate time.

3. Wider consented application:

3.1: To confirm, as shown on the associated drawings, the landscaping proposals in front of the Grade II Royal Terrace Pier (including the forecourt repaving) and Alexandra house are unchanged and the amendments purely relate to the frontage of the London River House and the Port Control Centre areas.

3.2: In addition to confirm no changes are proposed as part of the following sections of the consented development, based on the development description.

- Demolition of external stairwell
- Construction of a new single story roof space
- Removal and relocation of the radar mast (complete)
- Internal refurbishment
- Improvements to exterior facades
- Enhancement of existing link between the Port Control Centre and the Grade II Listed Royal Terrace Pier
- Repaving works in the forecourt area of the Grade II Listed Royal Terrace Pier.

3.3: Due to the amended plans for the external landscaping, an amended Flood Risk Assessment has also been submitted to replace the previous version. In terms of changes to the FRA these comprises the following:

- Paragraph 4.2.1 (SUDS Strategy)
- Figure 4-1: Proposed Landscaping / SuDS Features
- Appendix A1 - Development Proposals

3.4: The submitted document 'Appendix 1 List of Documents and Plans - Section 73 Application' details the specific documents, plans and drawings that are proposed to be amended to align with this proposal.

4. Summary

4.1: As with the consented development, the proposed amendments to the external landscaping will still achieve the aims of the development to unify the PLA ensemble and rectify the access and perception issues at the front of the site. The proposal will clear away unnecessary elements in front of the PLA site, particularly in front of London River House and the Port Control Centre and create a unified landscape improving legibility, hierarchy and a sense of civic public realm to the site. The proposed landscaping includes a number of works including creation of sloped ground, stairs and step access, planters, re-surfacing, re-location of the bin store to the corner of parking area west of London River House, removal of two parking spaces from the front of London River House, and re-location of decorative plaque and information board to in front of the link building. All existing trees are to be retained and protected. As a result of this section 73 application the works will still be subject to condition to secure full details.

4.2: Overall it is considered that the proposed amendments are considered to be positive and will enhance the environs of the site creating a more welcome, accessible and uniformed appearance. The proposals will continue to protect the architectural and historic interest of the Grade II listed Royal

Terrace Pier and would preserve and in some respect enhance the character and appearance of the Riverside Conservation Area, particularly through the protection of existing trees situated in front of the PLA complex. In this respect it is considered the proposal would be compliant with Policies CS19 and CS20 (LPCS) and saved Policies TC2 and TC3 (LPFR).