

Delegated Report

Approval of Details Application

Application no: 20250435

Location: Port Of London Authority London River House Royal Pier Road Gravesend

Description: Application for the approval of condition 12 and 13 attached to planning permission reference number 20221294 relating to a condition assessment of the site's tidal Thames flood defence and carry out such works as to provide a minimum 20-year service life for the site's tidal flood defence without the need for further intrusive works during this time. These repair works must be detailed in a report

Applicant: Mr Michael Atkins, Port of London Authority

Site Visit Date: N/A

Planning permission was granted for 'Demolition of an external stairwell, construction of a new single storey roof space, removal and relocation of the radar mast, internal refurbishment, improvements to the exterior facades and new landscaping to provide a level access to London River House and the PCC; the existing link between the PCC and Grade II listed Royal Terrace Pier will be enhanced, and repaving works is proposed in the forecourt area of the listed pier' on 20 April 2023 under application ref. 20221294. This was subject to a number of conditions including condition nos. 12 & 13 which this application seeks to discharge.

The information submitted with this application is:

- Application form;
- PCC Floodwall Inspection and Condition Report, ref. 0324-PLA-v1-XX-RP-K-0001, dated 3 February 2025, by the Port of London Authority;
- Comments to the Environment Agency from agent;
- Product Data Sheet – Sigmashield 880;
- Specification for sheet pile refurbishments; and

- Calculations for Design Check – Cantilever Section.

Consultations

Environment Agency – 09/07/2025 (First Comment)

We object to the discharge of condition 12.

We have no objection to the discharge of condition 13.

Section 1: Reasons for, and how to overcome, our objection(s)

Reason(s)

Having reviewed the submitted Inspection and Condition Report, we are unable to discharge condition 12 as we have some queries and require clarification on the following points.

We appreciate that the report indicates that 'There is no way to physically test the buried elements of the tie rod and is not the accepted practice to expose the end of the tie rod'. However, we believe that an assessment of the tie rods can be undertaken by use of trial pits and a jack-lifting tension test could be done on the anchors to provide more clarification.

The report does not specify what type of protective coating has been used for the remedial works undertaken on the defence and we seek clarification on the protective coating used.

Overcoming our objection

The applicant should undertake an assessment of the tie rods by use of trial pits and a jack-lifting tension test, or to provide robust evidence that this is not feasible. The applicant should also provide further information on the protective coating used.

Section 2: Further technical comments

Condition 12

The report demonstrates that the piles were originally capable of retaining 453kNm of bending moment and that this would be reduced to 385kNm by 2025. We are satisfied that this covers the point within Condition 12.

Condition 13

Information regarding the contents of Condition 13 should have been submitted for approval prior to the works going ahead on the flood defence wall. However, we are satisfied that a minimum 20-year service life has been met, therefore we have no objection to the discharge of Condition 13.

We would recommend that we are consulted on any work done to the flood defence in order to assess whether a Flood Risk Activity Permit is needed for the work. We acknowledge that the applicant has performed the remedial works to the flood defence wall without prior consultation and would recommend that any future work is discussed with us.

Environment Agency – 14/10/2025 (Final Comment)

We have no objection to the discharge of conditions 12 and 13.

Section 1: Technical comments

Condition 12

The applicant has submitted information that addresses the concerns raised in our previous response (dated, ref). We are therefore satisfied that condition 12 can be discharged.

The applicant has re-done the calculation with the tie bars completely removed and demonstrated that the wall will still pass structural analysis. The PCC Floodwall Inspection and Condition Report also concludes that the floodwall is in sufficient condition to resist the worst-case scenario

Condition 13

Information regarding the contents of Condition 13 should have been submitted for approval prior to the works going ahead on the flood defence wall. However, we are satisfied that a minimum 20-year service life has been met, therefore we have no objection to the discharge of Condition 13.

We would recommend that we are consulted on any work done to the flood defence in order to assess whether a Flood Risk Activity Permit is needed for the work. We acknowledge that the applicant has performed the remedial works to the flood defence wall without prior consultation and would recommend that any future work is discussed with us.

Analysis

Condition 12

Condition 12 is as follows:

12. Before any part of the site, which is to be redeveloped under this planning application, can be occupied, a condition assessment of the site's tidal Thames flood defence must be submitted to, and approved in writing by, the Local Planning Authority in consultation with the Environment Agency. As an absolute minimum, this must include:

- An assessment of the sheet pile's section loss with sufficient coverage to reasonably demonstrate that the worst-case corrosion has been determined.*
- A consideration for the worst-case bending moment of the flood defence.*
- Testing of the site's flood defence buried elements, such as tie rods.*
- The condition assessment should be submitted as a report with a stated remaining service life for the flood defence.*

Reason: To prevent an increased risk of flooding, to ensure that the development and the surrounding area is appropriately protected from flooding in accordance with Policy CS18 of the Gravesham Local Plan Core Strategy (2014) and section 14 of the National Planning Policy Framework (2021).

This condition was requested by the Environment Agency and they were consulted on the information submitted.

They objected to the original information submitted with this application in respect of the PCC Floodwall Inspection and Condition Report. They advised that they had some queries and required clarification on several points. They stated that they required the applicant to undertake an assessment of the tie rods by the use of trial pits and a jack-lifting tension test on the anchors or alternatively they would need to provide robust evidence that this is not feasible.

The agent provided additional information and with regards to the tie rods they confirmed that the PLA have re-done the calculations with the tie bars completely removed. They have provided calculations to show that even with no tie bars, the wall still passes structural analysis and that this therefore negates the need to inspect the tie bars. They advise that the risk of additional load being applied to the land near the flood wall is near zero due to the proximity of the PCC building and the fact it is on piles deeper than the flood wall foundations. In respect of the paint system, the applicant confirms that the paint system used for the remedial works was PPG Sigmashield 880 to a minimum of 250µm and a paint specification and safety data sheet of this product has been submitted. The applicant advises that the tested average thickness was 813µm as tested by PPG representatives.

In response to this additional information the Environment Agency have advised that this addresses the concerns raised and are therefore satisfied that condition 12 can be discharged.

As such overall it is considered that condition 12 of planning permission ref. 20221294 can be discharged.

Condition 13

13. Before any part of the site, which is to be redeveloped under this planning application, can be occupied, the applicant must carry out such works as to provide a minimum 20-year service life for the site's tidal flood defence without the need for further intrusive works during this time. These repair works must be detailed in a report which must be submitted to, and approved in writing by, the Local Planning Authority in consultation with the Environment Agency. The extent of the proposed works should be determined based

on the condition assessment.

Reason: To prevent an increased risk of flooding, to ensure that the development and the surrounding area is appropriately protected from flooding in accordance with Policy CS18 of the Gravesham Local Plan Core Strategy (2014) and section 14 of the National Planning Policy Framework (2021).

This condition was requested by the Environment Agency and they were consulted on the information submitted.

The Environment Agency advised that the information regarding the contents of Condition 13 should have been submitted for approval prior to the works going ahead on the flood defence wall. However, they are satisfied that a minimum 20-year service life has been met and therefore have no objection to the discharge of condition 13.

As such overall it is considered that condition 13 of planning permission ref. 20221294 can be discharged.

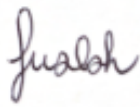
Conclusion

It is considered that sufficient information has now been submitted and that condition nos. 12 & 13 of planning permission reference 20221294 can be discharged.

Recommendation:

Approval of details

See draft Decision

Case Officer:	Ms Rebecca Harrison	Team Leader:	Mrs Faye Walsh
Signed:	<i>Rebecca Harrison</i>	Signed:	
Dated:	27th October 2025	Dated:	27 October 2025