

The Steam Tug Cervia Preservation Trust



By email:

Kelly Joyce
Planning Services
Gravesham Borough Council
Civic Centre, Windmill Street
Gravesend
Kent, DA12 1AU

1st July 2023

Dear Kelly

Application ref: 20230515 for a Lawful Development Certificate for the mooring of the historic steam tug Cervia at St Andrews Quay, Royal Pier Road, Gravesend, DA12 2BD, and its proposed use as a heritage museum under Use Class F1, in accordance with Section 192 of The Town and Country Planning Act 1990

I refer to the Port of London Authority's comments on the above application.

We are aware of the requirements with regards to the River Works Licence (RWL), EA Flood Risk Activity Permit, fitness for purpose of the proposed mooring arrangements, river wall, etc. These would of course all need to be addressed prior to carrying out the operation, however they are not a pre-requisite for the Planning Authority to determine whether the application should be permitted or not.

As you may be aware, Gravesham Borough Council is the RWL holder, at least the Council paid the PLA for the RWL. The Council has informed us that we will need to reimburse them the cost of amending the RWL, which we have allowed for in our costings.

We have had preliminary discussions and correspondence with the Environment Agency with regards to their requirements, and they have advised us that they have reviewed the proposed activity and that these works will not require a Flood Risk Activity Permit. Nevertheless, should they change their decision, we shall of course accommodate their requirements.

We have had discussions and correspondence with Beckett Rankine, and intend to engage them to carry out the necessary calculations and designs for the proposed berthing arrangements prior to carrying out any operations. Beckett Rankine carried out the necessary design calculations to facilitate the mooring of LV21 at St Andrews Quay, so they are eminently suitable for this activity.

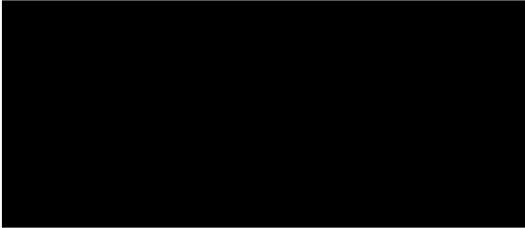
As I say, none of these are a pre-requisite for the application, they are not material planning considerations, and should have no influence on the determination of this application. But they are a pre-requisite before the operation is carried out, and you can be assured that all requirements will be met in at the appropriate time. As with any other planning decision, we would expect these to be conditions.

Moving on to the application for Lawful Development Certificate, we would remind you that the former Trinity House Lightship has been permanently berthed at this location since 2017, a period of six years, with permanent access installed, and operating as an arts and cultural venue. This use would also be classified as Use Class F1.

We are not aware of any planning permission or permitted Use Class for LV21, (and incidentally this was not even a pre-requisite for the PLA to grant the RWL). However, since it is already established that St Andrews Quay is in fact used for permanent mooring and for operations under Use Class F1, we do not consider that there would be any material change to its current established use, and that an Application for a Lawful Development Certificate for use under Use Class F1, in accordance with Section 192 of The Town and Country Planning Act 1990, is the appropriate procedure.

We trust this addresses the issues raised.

Yours sincerely



Trustee

For & on behalf of The Steam Tug Cervia Preservation Trust