

Rebecca Harrison
Gravesham Borough Council

Our ref: KT/2025/132524/01-L01
Your ref: 20250381

Sent by email

Date: 21 May 2025

Dear Rebecca,

Application for variation of condition 2 attached to planning permission reference number 20221294 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; to allow landscaping changes and amendment to the plans.

Port of London Authority, London River House, Royal Pier Road, Gravesend Kent

Thank you for consulting us on the above application which we received on 1 May 2025. As part of this consultation, we have reviewed the submitted plans and documents including:

- Flood Risk Assessment (FRA), ref. 10342643 V2, dated 10 April 2025, by HDR Consulting

Environment Agency position

We **object** to the proposed variation of condition 2 as the applicant has not adequately demonstrated that the proposed development would be made safe for its lifetime without increasing flood risk elsewhere, in line with paragraphs 178 and 181 of the National Planning Policy Framework.

Please refer to the following sections for our full response:

- Section 1: Reasons for, and how to overcome, our objection(s)
- Section 2: Notes to the Local Planning Authority / Applicant

Please note that our comments are based on the details available to us at the time of writing. Please be aware that we wish to be re-consulted on this planning application once the required information has been submitted. Please also note that our subsequent advice may concern other important environmental issues.

If you are minded to approve the application contrary to our objection, please contact us to explain why material considerations outweigh our objection. This will allow us to make further representations.

Should you have any queries regarding this response, please contact me.

Yours sincerely,

Gabrielle Delorme
Sustainable Places Planning Specialist
E-mail kslplanning@environment-agency.gov.uk

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

We object to the proposed variation of condition 2 as the proposal does not meet the requirements of the National Planning Policy Framework (NPPF).

To meet the requirements of the NPPF set out in paragraphs 178 and 181, the proposal should be made safe for its lifetime without increasing flood risk elsewhere. The site, located within Flood Zones 2 and 3, is partially protected by the tidal Thames flood defence. We have concerns relating to this existing flood defence wall.

We note from drawing ref. PCC-BA-90-ZZ-D-A-02 in the FRA Appendix A1 that the applicant proposes to remove the existing section of flood defence that wraps around the front of the building to the south. No further explanations or mitigation measures for this removal have been provided.

Additionally, the flood defence assets will require maintenance and crest level raising to maintain this standard of protection. We note that part of the defence appears to pass under London River House which may pose a significant challenge to maintaining the standard of flood protection to the site and surroundings. It was previously agreed during consultation on the original application LPA ref. 20221294 that this can be addressed at a later stage by suitably worded planning conditions (see our letter ref. KT/2023/130393/03 dated 24 March 2023) which were then included on the decision notice (dated 20 April 2023). This approach is therefore still considered acceptable.

Overcoming our objection

We require the applicant to elaborate on and provide justification for their proposal to remove a section of the flood defence wall.

Section 2: Notes to the Local Planning Authority / Applicant

Note to the LPA

Flood risk issues not within our direct remit

The following issues are not within our direct remit or expertise, but nevertheless may be important considerations for managing flood risk for this development. Prior to deciding this application, we recommend that consideration is given to the issues below. Where necessary, the advice of relevant experts should be sought.

- Adequacy of rescue or evacuation arrangements
- Details and adequacy of an emergency plan
- Provision of and adequacy of a temporary refuge
- Details and adequacy of flood proofing and other building level resistance and resilience measures
- Details and calculations relating to the structural stability of buildings during a flood
- Whether insurance can be gained or not
- Provision of an adequate means of surface water disposal such that flood risk on and off-site isn't increased

Note to the Applicant

Planning advice service

Should you wish us to review any technical documents or want further advice to address the environmental issues raised, we may do this as part of our charged for planning advice service.

Further engagement will provide you with the opportunity to discuss and gain our views on potential options to overcome our objection with us, before formally submitting further information as part of your planning application. It should also result in a better quality and more environmentally sensitive development.

As part of our charged-for service we will provide a dedicated project manager to act as a single point of contact to help resolve any problems. We currently charge £100 per hour, plus VAT. We will provide you with an estimated cost for any further discussions or review of documents. The standard terms of our charged for service are available [here](#).

If you would like more information on our planning advice service, including a cost estimate, please contact us at kslplanning@environment-agency.gov.uk