

Kelly Joyce
Gravesham Borough Council

Our ref: KT/2026/133348/01-L01
Your ref: 20260163

Sent by email

Date: 13 March 2026

Dear Kelly

Groundworks to provide tiered seating, an extended level hardstanding area adjacent to the river and improved access; hard landscaping including areas of hard surfacing and seating, relocated and new steps and ramp; soft landscaping including terrace, ornamental, shrub, tree and hedge planting; and installation of lighting.

St Andrews Gardens Royal Pier Road Gravesend Kent

Thank you for consulting us on the above application which we received on 26 February 2026.

As part of this consultation, we have reviewed the information available on the council planning portal, including the following documents:

- Flood Risk Assessment (ref. 25304, dated 23 January 2026, by MBA)
- Ecological Impact Assessment (ref. 25-1301-EcIA-RT, dated 27 January 2026, by Lakeway)
- Tree Constraints Plan (no. EV-5339-TCP, dated January 2026, by Evolve)
- Tree Protection Plan (no. EV-5339-TPP, dated January 2026, by Evolve)
- General Arrangements Plan (no. ML2564_MLOC_DR_L_1001, dated January 2026, by Verde Landscapes)
- Lighting General Arrangements Plan (no. ML2564_MLOC_DR_L_1006, dated February 2026, by Verde Landscapes)

Environment Agency position

We have **no objection** to the proposed development **subject to the following planning conditions** being included in any permission granted.

Please refer to the following sections for our full response:

- Section 1: Technical comments
- Section 2: Conditions and informatives
- Section 3: Advice to the Applicant / Local Planning Authority

Please note that our comments are based on the details available to us at the time of writing. If any subsequent changes are made to the application, please reconsult us.

Decision notice

In accordance with the planning practice guidance ([determining a planning application, paragraph 019](#)), please notify us by email within two weeks of a decision being made or application withdrawn. Please provide us with a URL of the decision

notice, or an electronic copy of the decision notice or outcome.

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: Technical comments

Fisheries, Biodiversity and Geomorphology

Having reviewed the submitted information, our position is that the area would benefit from a Landscape and Ecological Management plan.

The installation of new hardstanding and lighting could have an unacceptable effect on the ecological value of the water-dependent habitat at this site. Due to the effects of potential over-lighting of the watercourse and/or affects upon bat and bird species.

Ecological enhancements that have been proposed will require a management plan to be in place. This will ensure the landscape provides a maximum benefit to people and the environment.

The Thames river basin management plan requires the restoration and enhancement of water bodies to prevent deterioration and promote their recovery. Without a landscape management plan, the proposal's ecological impact may lead to a deterioration of a water quality element to a lower status class. This is because, due to the increase in hardstanding, potentially, there will be an increase in non-attenuated and filtered surface water run-off.

In-light of the above, the proposed development will only be acceptable if a planning condition requiring a landscape management scheme (as set out in Section 2 of this letter) is included in any permission granted.

This approach is supported by paragraphs 187 and 193 of the National Planning Policy Framework (NPPF) which recognise that the planning system should conserve and enhance the environment by minimising impacts on and providing net gains for biodiversity. If significant harm resulting from a development cannot be avoided, adequately mitigated, or as a last resort compensated for, planning permission should be refused. Without this condition we would object to the proposal because it cannot be guaranteed that the development will not result in significant harm to the riverine environment.

Flood risks

We have no objection from a flood risk perspective. The applicant is proposing appropriate root containment measures to ensure that the tree planting will not impact the flood defence. These measures should be secured by a planning condition, as set out in Section 2 of this letter.

Section 2: Conditions and informatives

Note to the LPA: Condition wording

If you wish to amend the wording of our requested conditions or if you wish to merge them with other statutory consultees/Local Planning Authority conditions, please contact us to discuss the revised wording.

Condition 1 (Landscape and ecological management plan)

No development shall take place until a landscape and ecological management plan, including long-term design objectives, management responsibilities and maintenance schedules for all landscaped areas (except privately owned domestic gardens), has been submitted to, and approved in writing by, the local planning authority. The landscape and ecological management plan shall be carried out as approved and any subsequent variations shall be agreed in writing by the local planning authority.

The scheme shall include the following elements:

- details of maintenance regimes
- details of Bat and Fish friendly lighting (informed by the Bat conservation Trust)
- details of any new habitat created on or off-site
- details of treatment of site boundaries and/or buffers around water bodies
- details of management responsibilities

Reason: To ensure the protection of wildlife and supporting habitat. Also, to secure opportunities for enhancing the site's nature conservation value in line with national planning policy and Gravesham Biodiversity Strategy 2025-2030.

Condition 2

The applicant shall implement root containment measures as detailed within 'Tree Constraints Plan, St Andrews Park, Gravesend, Drawing No. EV-5339-TCP, Jan 2026' and 'Tree Protection Plan, St Andrews Park, Gravesend, Drawing No. EV-5339-TPP, Jan 2026'.

Reason: To ensure the structural integrity of the existing flood defences thereby reducing the risk of flooding.

Informative 1 (Environmental permit – Flood risk activities)

The Environmental Permitting (England and Wales) Regulations 2016 require a permit or exemption to be obtained for any of the following activities:

- erecting any temporary or permanent structure in, over or under a main river, such as a culvert, outfall, weir, dam, pipe crossing, erosion protection, scaffolding or bridge
- altering, repairing or maintaining any temporary or permanent structure in, over or under a main river, where the work could affect the flow of water in the river or affect any drainage work
- building or altering any permanent or temporary structure designed to contain or divert flood waters from a main river

- dredging, raising or removing any material from a main river, including when you are intending to improve flow in the river or use the materials removed
- diverting or impounding the flow of water or changing the level of water in a main river
- quarrying or excavation within 16 metres of any main river, flood defence (including a remote defence) or culvert
- any activity within 8 metres of the bank of a main river, or 16 metres if it is a tidal main river
- any activity within 8 metres of any flood defence structure or culvert on a main river, or 16 metres on a tidal river
- any activity within 16 metres of a sea defence structure activities carried out on the floodplain of a main river, more than 8 metres from the river bank, culvert or flood defence structure (or 16 metres if it is a tidal main river), if you do not have planning permission (you do not need permission to build agricultural hay stacks, straw stacks or manure clamps in these places)

For further guidance please visit [Flood risk activities: environmental permits - GOV.UK](#) or contact our National Customer Contact Centre on 03708 506 506 (Monday to Friday, 8am to 6pm) or by emailing enquiries@environment-agency.gov.uk.

The applicant should not assume that a permit will automatically be forthcoming once planning permission has been granted, and we advise them to consult with us at the earliest opportunity.

Section 3: Advice to the Applicant / Local Planning Authority

Advice to 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

Advice to applicant

Biodiversity Net Gain

The Environment Act 2021 introduced a requirement for mandatory Biodiversity Net Gain (BNG) on most types of Town and Country Planning Act (TCPA) development. Biodiversity net gain offers an opportunity to promote and achieve our desired environmental outcomes – nature recovery, natural flood management, nature-based solutions and green and blue infrastructure.

Please note, for this application we have not reviewed any submitted BNG information in detail and our position on this application does not mean the biodiversity gain objective has been met. In line with the "[Biodiversity Net Gain](#)" section of the Planning Practice Guidance, it is the role of the Local Planning Authority role to decide if the BNG requirement for development in scope has been met.

Intertidal habitats should be recorded within the area unit module of the metric. Applicants should record areas of intertidal habitats which are above water at low tide and under water at high tide.

Further information, data and advice on our rivers and catchments can be found using the [England | Catchment Data Explorer](#) and [River Basin Management Plans](#).

Note to applicant

Planning advice service

Should you wish us to review any technical documents or want further advice to meet the requirements of the conditions recommended, we may do this as part of our charged for planning advice service.

Further engagement will provide you with certainty of our position as to what our response to your planning application will be. 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 £115 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