

Gravesham Borough Council
Development Control
Civic Centre Windmill Street
Gravesend
Kent
DA12 1AU

Our ref: KT/2022/129861/02-L01
Your ref: 20220733
Date: 06 December 2022

Dear Peter

The Installation Of Two Additional Bitumen Tanks, Load Out Gantry And The Installation Of A Bitumen Emulsion Plant And Alternative Car Parking.

FM Conway, Imperial Wharf, Clifton Marine Parade, Gravesend, Kent, DA11 0DY

Thank you for consulting us on the above application. **We do not object to the proposal in principle but we do require additional information as set out below.**

Flood Defence

The applicant has provided the offset between the proposed bitumen tanks, and associated structures. However, we maintain that an increased offset is required to permit maintenance, repair and to allow for future raising. As the proposed development does not consider raising to the 2070 Thames Estuary Defence Level for this site, maintaining an offset for future works is of additional importance. It is noted that there is existing development, including bitumen tanks, in closer proximity to the defences but we seek to avoid worsening the current situation. **Therefore, the emulsion tank (offset 5.7 metres) and load out gantry (offset 6.7m) should be moved back from the tidal defence to provide the required 16m offset.**

As previously stated, a 100-year development, adjacent to the tidal Thames, must consider the condition and defence raising in line with the requirements of the Thames Estuary 2100 plan. Considering the limited scope of the proposed development, we would be satisfied with 2040 defence raising in addition to the repair works detailed in the 'Structural Inspection Report'. However, **the application should include details of how the 2040 raising would be carried out and integrated with the existing river wall.**

Other Considerations

Please could the design of the vehicle barrier be confirmed, in particular will this be attached to the ground and able to withstand collision with large moving vehicles. **Additionally, we require a plan view demonstrating vehicle barrier placement.**

We require details for how the new bitumen line will be installed and how this will interact with the flood defence.

We would also require a consideration for the increased loading to the river wall and resulting from the development within 16 metres of the tidal defence.

Informative

The Environmental Permitting (England and Wales) Regulations 2016 require a permit to be obtained for any activities which will take place:

- on or within 8 metres of a main river (16 metres if tidal)
- on or within 8 metres of a flood defence structure or culvert (16 metres if tidal)
- on or within 16 metres of a sea defence
- involving quarrying or excavation within 16 metres of any main river, flood defence (including a remote defence) or culvert
- in a floodplain more than 8 metres from the river bank, culvert or flood defence structure (16 metres if it's a tidal main river) and you don't already have planning permission.

Please be aware that the Tidal Thames Defences are likely to incorporate buried elements which may extend further inland than the above ground river wall.

For further guidance please visit <https://www.gov.uk/guidance/flood-risk-activities-environmental-permits> or contact our National Customer Contact Centre on 03702 422 549. 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.

In preparation for the required Flood Risk Activity Permit, we would require the application to be supported by a method statements. This must detail what construction activities would be carried out within 16 metres of the tidal flood defences.

Please do not hesitate to contact us should you require any further information.

Yours faithfully

Ms Laura Edwards

Planning Advisor

Direct dial 02084749079

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Environment Agency

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