

Alison Webster
Gravesham Borough Council

Our ref: PA-0005494/01
Your ref: 20260568

Sent by email

Date: 23 June 2026

Dear Alison,

Application to determine if prior approval is required for a proposed; Change of use of an agricultural building into five holiday let accommodation units, of the Town and Country Planning (General Permitted Development) (England) Order 2015 (as amended) - Schedule 2, Part 3, Class R.

Abbey Farm Barn Church Street Higham Rochester Kent ME3 7LS

Thank you for consulting us on the above application which we received on 2 June 2026. As part of this consultation, we have reviewed the following documents:

- Flood Risk Assessment (FRA) and Drainage Strategy, ref. GB/VL/P22-2731/01, dated December 2022, by Create Consulting Engineers
- Proposed floor plans and elevations
- Site location plan

Environment Agency position

We **object** to the proposed development as submitted on the basis that the risk to life for occupants in the event of a breach of the tidal flood defences would be unacceptable.

Please refer to the following sections for our full response:

- Section 1: Reasons for, and how to overcome, our objection(s)
- Section 2: 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.

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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Objection: Risk to life**Reason**

The site lies within Flood Zone 3, which is land defined by the planning practice guidance as having a high probability of flooding. Notwithstanding the mitigation measures proposed, the risk to life and/or property, from fluvial inundation would be unacceptable if the development were to be permitted.

The supporting FRA suggests appropriate measures to mitigate the residual of flooding from a breach of tidal flood defences, in particular recommending setting the finished floor levels at a minimum height of 4.55mAOD.

However, the FRA is a bit vague about which of these mitigations will actually be implemented and the submitted plans do not confirm that these mitigation measures have been incorporated into the design. Especially, the proposed plans do not include the finished floor levels.

As this is a prior approval application, we understand that it is not appropriate to use a planning condition to secure the implementation of appropriate flood risk mitigation measures. We therefore object to this proposal on the basis that the risk to life for occupants in the event of a breach of the tidal flood defences would be unacceptable, in line with National Planning Policy Framework paragraph 178b.

Overcoming our objection

The applicant should amend the proposed plans to include minimum flood level of 4.55mAOD in order to demonstrate that the proposed development will not pose a risk to life and/or property as highlighted above.

Ideally, the FRA could also be revised to state that mitigation measures will be implemented rather than just 'recommending' the measures.

Section 2: Advice to the Applicant / Local Planning Authority

Exception test

In accordance with the National Planning Policy Framework (paragraphs 178 and 179), the proposed development is appropriate provided that the site meets the requirements of the exception test.

Our comments on the proposals relate to the part of the exception test that demonstrates the development is safe. The local planning authority must decide whether or not the proposal provides wider sustainability benefits to the community that outweigh flood risk.

Flood resistance and resilience

We strongly recommend the use of flood resistance and resilience measures. Physical barriers, raised electrical fittings and special construction materials are just some of the ways you can help reduce flood damage.

To find out which measures will be effective for this development, please contact your building control department. If you'd like to find out more about reducing flood damage, visit the Flood Risk and Coastal Change pages of the planning practice guidance. Further guidance on flood resistance and resilience measures can also be found in:

Government guidance on flood resilient construction

<https://www.gov.uk/government/publications/flood-resilient-construction-of-new-buildings>

CIRIA Code of Practice for property flood resilience

https://www.ciria.org/Research/Projects_underway2/Code_of_Practice_and_guidance_for_property_flood_resilience.aspx

British Standard 85500 – Flood resistant and resilient construction

<https://shop.bsigroup.com/ProductDetail/?pid=000000000030299686>

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