

Richard Hart
Gravesham Borough Council

Our ref: PA-0008031/01
Your ref: 20260683
17 July 2026

Sent by email

Dear Mr Richard Hart,

Application for variation of condition 2 (Approved Plans) and condition 7 (Highway Works) attached to planning permission reference number 20191122 for The erection of two buildings to provide a total of 227no. dwellings with associated vehicle parking, cycle storage, highway works, and landscaping. Building 1 comprises the erection of a 23 storey tower on the north side of West Street to provide 121no. dwellings with 1no business Unit (B1a) comprising 90 sqm of floor space at ground floor level; and Building 2 from four storeys to 12 storeys on the south side of West Street which will provide 106no. dwellings. The proposal includes the restoration and adaptation of the existing pier structure to provide public and private amenity space to include the erection of 16no. Business(B1a) units comprising a total of 510 sqm of floor space; and a cafe (A1/A3) comprising up to 60 sqm of floor space.; to allow the reduction in height by 7 storey's, the reduction and relocation of parking and the increase in cycle parking.

Clifton Slipways West Street Gravesend Kent

Thank you for consulting us on the above application which we received on 13 July 2026. As part of this consultation, we have reviewed the following documents and those available on the planning portal:

- Addendum to the DAS (18.137, May 2026, Hollaway)

Environment Agency position

We have **no objection** to the planning application and have provided some advice below regarding the application.

Please refer to the following sections for our full response:

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

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being made or application withdrawn.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,

Carly Morrison

Sustainable Places Planning Advisor

E-mail kslplanning@environment-agency.gov.uk

Section 1: Conditions and Informatives

Informatives

Flood Risk Activity Permit

This is to be used for all developments containing any of the below.

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.

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 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 2: Advice to the Local Planning Authority

Flood risk standing advice

The proposed development falls within Flood Zone 3, which is land defined in the [planning practice guidance](#) as being at risk of flooding.

We have produced a series of standard comments for local planning authorities and planning applicants to refer to on 'lower risk' development proposals. These comments replace direct case-by-case consultation with us. This proposal falls within this category.

These standard comments are known as Flood Risk Standing Advice (FRSA). They can be viewed at <https://www.gov.uk/guidance/flood-risk-assessment-for-planning-applications#when-to-follow-standing-advice>

We recommend that you view our standing advice in full before making a decision on this application.

Flood mitigation

The development lies within Flood Zone 2 and falls under our FRSA (as above). The developer may wish to include additional measures to mitigate the impact of more extreme future flood events. Measures could include raising ground or finished floor levels and/or incorporating flood proofing measures. Further guidance on preparing properties for flooding can be found at <https://www.gov.uk/government/publications/prepare-your-property-for-flooding>.

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

Section 3: Advice to the Applicant

Biodiversity net gain (rivers metric)

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.

Applications subject to statutory BNG require completion of the Watercourse Unit Module by a competent person if:

- a watercourse is onsite,
- the watercourse bank top is within 10m of the redline boundary (i.e. the red line boundary intersects the riparian zone).
- For ditches, the Watercourse Unit Module is applied where the bank top is located within 5m of the red line boundary.
- a culvert lies within the red line boundary.

We recommend that you refer to the following to assist your assessment of the watercourse metric:

[Watercourse Metric \(within the Biodiversity Metric\) - checklist to aid the reviewer.pdf \(local.gov.uk\)](#)

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

Biodiversity Net Gain (intertidal)

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](#).