

Rebecca Harrison
Gravesham Borough Council

Our ref: KT/2025/132651/01-L01
Your ref: 20250435

Sent by email

Date: 09 July 2025

Dear Rebecca,

Application for the approval of condition 12 and 13 attached to planning permission reference number 20221294 relating to a condition assessment of the site's tidal Thames flood defence and carry out such works as to provide a minimum 20-year service life for the site's tidal flood defence without the need for further intrusive works during this time. These repair works must be detailed in a report.

Port of London Authority, London River House, Royal Pier Road, Gravesend, Kent DA12 2BG

Thank you for consulting us on the above application which we received on 19 June 2025. As part of this consultation, we have reviewed the following documents:

- PCC Floodwall Inspection and Condition Report, ref. 0324-PLA-v1-XX-RP-K-0001, dated 3 February 2025, by Port of London Authority

Environment Agency position

We **object** to the discharge of condition 12.

We have **no objection** to the discharge of condition 13.

Please refer to the following sections for our full response:

- Section 1: Reasons for, and how to overcome, our objection(s)
- Section 2: Further technical comments
- Section 3: Advice to the 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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Reason(s)

Having reviewed the submitted Inspection and Condition Report, we are unable to discharge condition 12 as we have some queries and require clarification on the following points.

We appreciate that the report indicates that 'There is no way to physically test the buried elements of the tie rod and is not the accepted practice to expose the end of the tie rod'. However, we believe that an assessment of the tie rods can be undertaken by use of trial pits and a jack-lifting tension test could be done on the anchors to provide more clarification.

The report does not specify what type of protective coating has been used for the remedial works undertaken on the defence and we seek clarification on the protective coating used.

Overcoming our objection

The applicant should undertake an assessment of the tie rods by use of trial pits and a jack-lifting tension test, or to provide robust evidence that this is not feasible. The applicant should also provide further information on the protective coating used.

Section 2: Further technical comments
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Condition 12

The report demonstrates that the piles were originally capable of retaining 453kNm of bending moment and that this would be reduced to 385kNm by 2025. We are satisfied that this covers the point within Condition 12.

Condition 13

Information regarding the contents of Condition 13 should have been submitted for approval prior to the works going ahead on the flood defence wall. However, we are satisfied that a minimum 20-year service life has been met, therefore we have no objection to the discharge of Condition 13.

We would recommend that we are consulted on any work done to the flood defence in order to assess whether a Flood Risk Activity Permit is needed for the work. We acknowledge that the applicant has performed the remedial works to the flood defence wall without prior consultation and would recommend that any future work is discussed with us.

Section 3: Advice 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 £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