
From: Lucy Owen <lucy.owen@pla.co.uk>
Sent: 11 August 2021 17:22
To: Planning Admin
Subject: 20210757 - Custom House, Gravesend (DC857)

FAO: Rebecca Harrison

Thank you for your letter dated 20 July 2021 regarding the re-development of the site and conversion of the existing building to provide 27 residential units with associated landscaping, parking and vehicular access. I have now had the opportunity to review the submitted documentation and would advise that the PLA **objects** to the proposed development.

Location

As you will be aware, the application site is immediately adjacent to the PLA's Gravesend Complex. From here, the PLA undertakes various administrative and operational functions relating to the safe functioning of the Port of London and the infrastructure at the complex reflects the activities undertaken. For example, there are survey, pilot and other vessels including the RNLI's vessels based at the pier and there is navigational equipment located on the roof of Alex House. The operations that the PLA undertake mean that there is a presence at the Gravesend Complex 24 hours a day, 7 days a week, 365 days a year. The application site is immediately adjacent to (and appears in part to share a boundary wall with) the PLA's car park.

Immediately opposite the application site is Tilbury 2, a new port terminal and associated facilities on the site of the former Tilbury Power Station. Amongst other things there is a RoRo terminal which imports and exports containers and trailers and a CMAT terminal is proposed which will be the UK's largest construction material terminal.

There is also significant general river activities which take place 24/7 to fit in with the tides.

In line with the Agent of Change Principle and Gravesham Borough Council's planning policy, it is vital that these essential river related facilities and activities are protected, and that any residential development proposed at Customs House has been designed to minimise the potential for conflicts of use and disturbance. It is unclear from the submitted documents how the applicant has assessed the potential juxtaposition issues associated with having residential development in such close proximity to port operations and the PLA would have expected the Planning Statement to address the policy issues and for specific documents such as a noise, air quality and lighting reports to assess the potential juxtaposition issues and to set out and secure the required mitigation measures.

Layout of the Proposed Development

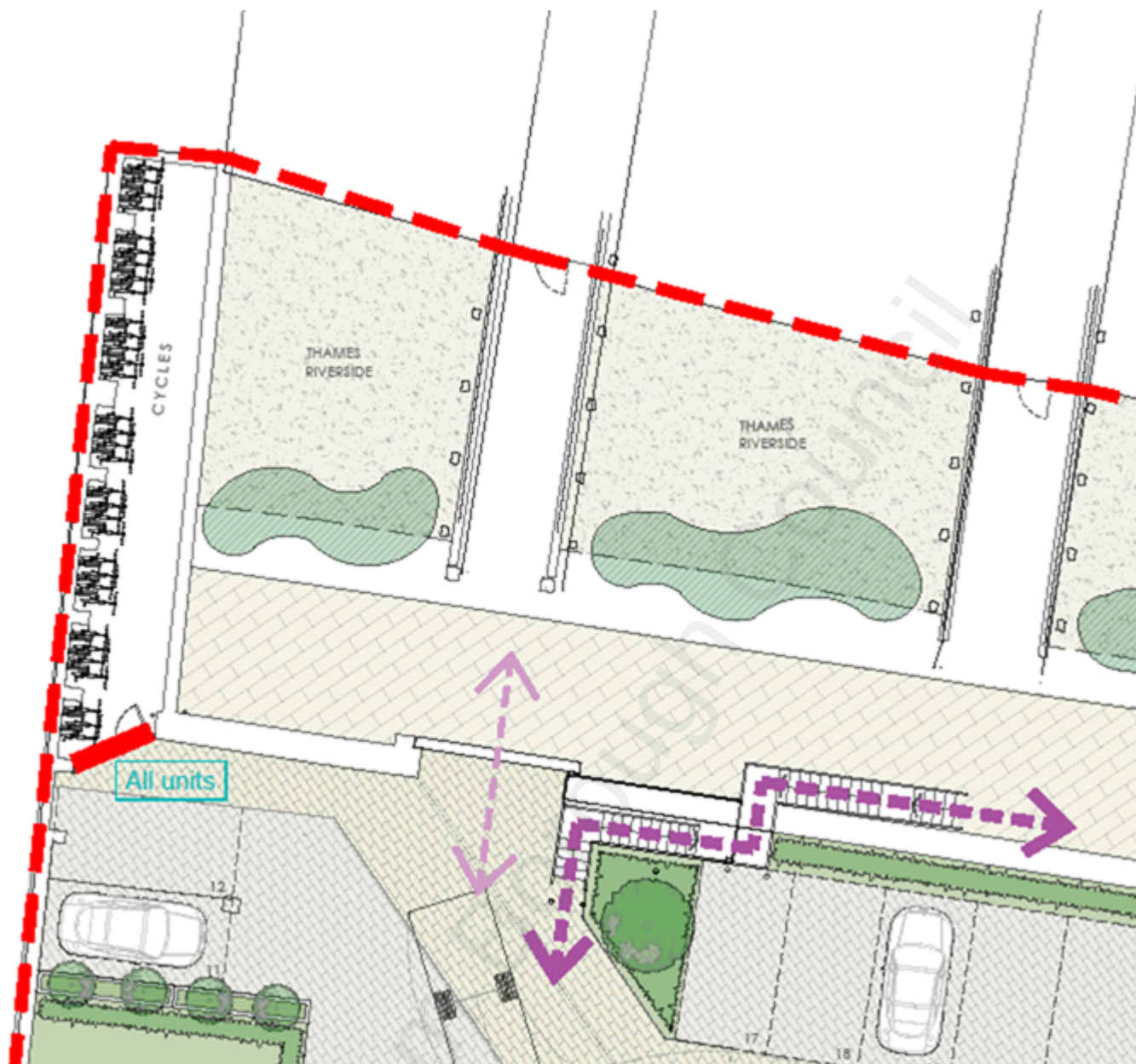
Design should be used to minimise the potential for conflicts of use and disturbance rather than relying on mitigation measures alone. The PLA is concerned about the proximity of the proposed residential development to the boundary of the PLA's Gravesend Complex. As the image below (taken from the application documents) shows, an existing building the 'Boat House' is to be repurposed for residential use and windows are to be introduced along the boundary, directly overlooking the PLA's car park. A new building is proposed with windows overlooking the PLA's site and this building appears to be immediately on the boundary (and potentially utilising the boundary wall) with the PLA's car park. Notwithstanding the logistical issues that may arise from constructing a building so close to the PLA's land and whether it would be possible, without entering onto/over the PLA's property, it raises significant issues about whether the development has been designed to minimise the potential for disturbance and complaints. The addition of bedroom windows at first floor level which would open onto/over the car park combined with the PLA's activities including 24/7 vehicle movements, means that there would be a high probability of complaints from residents. The PLA's Health and Safety requirements mean that all vehicles are reversed parked in the car park and residents would therefore be subjected to emissions from vehicles as well as noise from vehicles reversing (which would include audible warnings on vans etc about vehicles reversing). The designated smoking area is along the boundary as is the designated muster point.



The PLA would re-iterate its comment above that specific reports should assess the potential juxtaposition issues and the design of the development should be given specific consideration, with as a minimum, the new building being set back from the boundary at a similar distance to the existing building and the internal layout of the buildings being re-configured to remove windows from the elevation and habitable rooms from the boundary.

Red line Boundary

As shown below the application boundary appears to include parts (but not all) of the existing licensed Works.





It would appear that the Applicant would like to utilise the part of the Works closest to the land and potentially put additional works over Mean High Water. Despite the pre-application advice provided by the PLA, no river related uses appear to have been considered or are being advanced for the existing structures. This is a significant missed opportunity. Additionally as proposed, the use of part of the structures (albeit it is unclear what for) and the layout of the landside development could result in it not being possible to re-use the existing licensed Works for a river related use in the future. All Works over Mean high water are licensed by the PLA. The Applicant appears to be proposing development partly on someone else's licensed works and it is unclear whether they are aware of or consent to this. Any existing River Works Licences would need to be varied and, in line with the pre-application advice given, the PLA would be seeking for the Works to have a river related use. The PLA is aware of operator interest in using these Works and therefore the Applicant must demonstrate that their development would not prohibit river related use of the Works and justify the red line boundary.

Surface Water / Flooding

The Flood Risk Assessment states at 8.3 that *"it is assumed the site drains directly into the River Thames"* and at 8.4 it is proposed to discharge surface water runoff into the River Thames if infiltration is not viable. It is clear from the report, that the Applicant is not completely clear as to the consents required and they also appear to be proposing an outfall that could become tide locked for certain durations and a system that could result in surcharge resulting in the storage of water above ground in the parking area until the water level in the river falls. Any Works over Mean High Water require a licence from the PLA and this includes any outfall.

Additionally, the Flood Risk report doesn't appear to address the issue of the flood gate – which would of course need to be shut in order to prevent flooding of the site. With the applicant's proposals extending in front of the flood gate it is not clear how this aspect of the development would work and whether the gate would be predominately in the closed or open position. If in the open position what procedure would be in place to ensure that it was shut when required to prevent flooding of the site and how would it be ensured that people with mobility issues do not end up the wrong side of the gate if it is shut at high tide given that the only other way of exiting the area would be via steps.

Suicide Prevention and Shore Side Safety

It is unclear from the design of the development whether it would encourage members of the public to enter the site, or whether it would be in effect a gated development. However, the proposed development appears to show uncontrolled access to the Thames / foreshore via the flood gate and steps over the River wall. The foreshore is a dangerous place and the current design of the proposed development appears to provide significant opportunities for accidental entry to the river and for self harm entry to the river. The Drowning Prevention Strategy <https://www.pla.co.uk/assets/drowningpreventionstrategy.pdf> and riverside guidance “A Safer Riverside” <https://www.pla.co.uk/assets/asaferriversidev15.pdf> provide advice and guidance on development close to the River.

The application site will need to have riparian life saving equipment installed and it will need to be maintained over the life time of the development. Additionally, what measures would be in place to prevent rubbish (litter) ending up in the river from people accessing the area in front of the flood gate.

Access and Car Parking

Whilst appreciating this is a town centre site, the Council needs to satisfy itself that there is sufficient car parking for the number of residential units proposed. Additionally, the Council should consider whether any changes are required to the top of the one way system/Royal Pier Road as a result of the proposed development. The junction (see image below) often results in people coming round the one way system, turning into Royal Pier Road and then turning right (some involving a three point turn first across the top of the junction) to then go down the area between the yellow lines and the hatched white area so that they can then travel down The Terrace.



Ecology

For the coastal planting, although native to the UK, the plant species shown in the proposed landscaping plan are not native to the Thames and therefore it is recommended that these species are changed for species commonly found in the Thames or on the banks of the Thames.

Additionally for the northern wall of the terrace next to the gazebo, has the applicant considered the implementation of any of the vertical wall options from the Estuary Edges guidance (<https://www.estuaryedges.co.uk/design-principles/#guidelines-specific-to-wall-options>) which would provide more ecological value to a piece of infrastructure.

Loss of Office Floor Space

The site is in the Gravesend Town Centre Opportunity Area (site 3.4 East of Town Centre and Riverside). The Core Strategy (see for example para 4.6.37) talks about protecting employment floorspace unless it is truly redundant for modern needs and facilitating the expansion of river related employment. It is difficult to see how the proposed

development accords with the Core Strategy in terms of policy CS07 (economy, employment and skills). The Council should satisfy itself that it has been demonstrated that there is no demand for the employment floorspace.

Lighting

Finally, given the location of the development full details of all external lighting should be submitted and approved. I hope the above is of assistance.

Regards

Lucy

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