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people and wildlife



Rebecca Harrison
Gravesham Borough Council
Sent via email

Our ref: KT/2024/132146/01-L01
Your ref: 20241023

Date: 18 December 2024

Dear Rebecca Harrison

Application for approval of Condition 9, 10 and 11 attached to planning permission reference number 20210757 relating to a scheme for the design and construction of the proposed raised tidal flood defence, a long-term monitoring and maintenance plan for the flood defence structures and applying for as long as the development remains and the designing of the new flood defence wall subject to condition 9 shall consider the structural impact on the grade ii listed gazebo as well as its access and use. this impact shall be demonstrated through the submission of a report.

Redevelopment of the site and conversion of the existing building to provide 27 residential units (6 x 1 bed, 12 x 2 bed and 9 x 3 bed) with associated landscaping, parking and vehicular access.

Custom House, The Terrace, Gravesend, Kent DA12 2BW

Thank you for consulting us on the above application on 20 November 2024.

Environment Agency Position

We do not recommend the discharge of Conditions 9 and 10 for the reasons set out below.

Flood Risk

The report submitted is very thorough and looks very positive. This is not an objection in principle. However, we would like to ask some further questions for clarification under policies 170 and 181 of the National Planning Policy Framework.

Long-term Monitoring and Maintenance Plan

We welcome the proposal to replace the floodwall, and this proves to be a more robust solution for the flood defence. However, we are not confident that ultrasonic thickness testing can be performed if the sheet pile has been encased in concrete. Flexing of the concrete may cause the concrete cover to crack and break prematurely. We do not believe that encasing the sheet pile wall with concrete will secure the condition of the sheet pile for the remainder of its lifetime. This is because

the ultrasonic testing proposed may be ineffective and areas that require attention due to degradation over time may be missed and not remediated.

Additionally monitoring of the sheet pile wall will be very difficult to perform without intrusive testing.

Monitoring Schedule

It is our view that the visual inspection could be done annually for the first 3 years and then it could be relaxed to be visually inspected every 5 years if the river wall is to be replaced fully.

Overcoming Our Objection

We request clarity on the detailed design of the new flood defence in line with the comments above to ensure that it will be fit for purpose for the lifetime of the development in accordance with policies 170 and 181 of the National Planning Policy Framework.

Additional Comments: Impact of the flood defence works on the Gazebo Building

We welcome the proposed secure exclusion zone to be established around the gazebo to safeguard the structure from the works being carried out in close-proximity. A structural assessment has determined that the proposed design and construction of the new flood defence wall will have no or very little impact on the Grade II Listed gazebo.

Planning advice service

Should you wish us to review any technical documents or want further advice to we may do this as part of our charged for planning advice service.

Further engagement will provide you with certainty of our position as to what our response to your planning application will be. 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 £100 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

Note to LPA

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.

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

Yours faithfully

Ms Laura Edwards

Planning Advisor

Direct e-mail KSLPLANNING@environment-agency.gov.uk