

Gravesham Borough Council
Development Control
Civic Centre Windmill Street
Gravesend
Kent
DA12 1AU

Our ref: KT/2021/128685/04-L01
Your ref: 20210757
Date: 25 January 2023

Dear Planning Team,

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. **We maintain our objection for the reasons set out below.**

Fisheries, Biodiversity and Geomorphology

We maintain our objection set out in our letter dated 25 October 2022 as no further information to address this has been submitted.

Flood Risk

Thank you for the additional information submitted in connection with the flood defence. We welcome the proposal for a new tidal flood defence across the entirety of the Custom House frontage with a crest level of no less than 8 metres Above Ordnance Datum and a 100 year design life. **However, we maintain our objection until the applicant has confirmed buildability of the new flood defence and agreed to remove the existing flood defence assets.**

Applicant's Stated Position

The uncertainty in the applicant's proposal prevents the removal of our objection. Although final, detailed designs may be secured through a planning condition, we require further information to demonstrate buildability of the new flood defence.

The applicant has submitted a cover letter (reference: TV/2813/15094, dated 21/12/2022) where it is stated that they would now like to propose a full replacement of the flood defences. It is then stated that this decision has been taken to enable the application to move forward. We consider that a new tidal flood defence, in keeping with the Thames Estuary 2100 plan, is the only option that the Environment Agency could support based on the information received to date. The letter then states that defence replacement is considered a fall-back position. It is noted that the applicant refers to potential carbon savings, but these have not been evidenced.

Overcoming Our Objection Removal of Existing Asset

The revised report states that the existing tidal flood defence and flood gate would remain in position whilst a new sheet pile wall and concrete capping beam would be installed landward of the existing asset.

Although, this may offer some additional protection to the new defence, keeping the existing masonry, sheet pile and floodgate in place would severely reduce the applicant's and Environment Agency's ability to inspect the flood defence and to carry out any future repair works.

We require the floodgate and existing flood defence to be removed and the sheet pile to be cut below ground levels. We note that the applicant has previously agreed to replace the return section of tidal defence and we support this approach.

Buildability of Design

We require sufficient design information to ensure that the proposed tidal flood defence can protect the site from future sea levels for the development's design life. Whilst detailed designs may be submitted as part of a future condition, the applicant needs to demonstrate buildability of the design at this stage. The following are minimum requirements to be submitted in support of this development:

- Demonstrate that the defence can provide the required level of flood protection for the design life of the residential development with a consideration for future sea levels in line with the Thames Estuary 2100 Plan.
- Removal of existing site flood defence assets, namely: the floodgate and sheet pile/masonry wall.
- We note that the return section of wall features a waling beam and the design should consider if a replacement is needed and the impact to the neighbouring non-flood defence wall.
- How the new defence will integrate with neighbouring flood defences.

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

Yours faithfully

Ms Laura Edwards
Planning Advisor

Direct dial 02084749079

Direct email KSLPLANNING@environment-agency.gov.uk