

Rebecca Harrison
Gravesham Borough Council

Our ref: KT/2025/132524/02-L01
Your ref: 20250381

Sent by email

Date: 01 August 2025

Dear Rebecca,

Application for variation of condition 2 attached to planning permission reference number 20221294 for Demolition of an external stairwell, construction of a new single storey roof space, removal and relocation of the radar mast, internal refurbishment, improvements to the exterior facades and new landscaping to provide a level access to London River House and the PCC. The existing link between the PCC and Grade II listed Royal Terrace Pier will be enhanced, and repaving works is proposed in the forecourt area of the listed pier; to allow landscaping changes and amendment to the plans.

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

Thank you for consulting us on the above application which we received on 1 May 2025. As part of this consultation, we have reviewed the submitted plans and documents including:

- Flood Risk Assessment (FRA), ref. 10342643 V3, dated 19 May 2025, by HDR Consulting
- Proposed external works layout foundation general arrangement, ref. PCC-HDR-XX-ZZ-DR-S-02111 rev P2, dated 5 June 25, by HDR Consulting
- Proposed external works layout sections & details, ref. PCC-HDR-XX-ZZ-DR-S-02114 rev P1, dated 5 June 25, by HDR Consulting

Environment Agency position

We **object** to the proposed variation of condition 2 as the applicant has not adequately demonstrated that the proposed development would be safe for its lifetime without increasing flood risk elsewhere, in line with paragraphs 178 and 181 of the National Planning Policy Framework.

Please refer to the following sections for our full response:

- Section 1: Reasons for, and how to overcome, our objection(s)
- Section 2: Other technical comments
- Section 3: Notes to the Local Planning Authority / 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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Reasons

The submitted drawing 'Proposed external works layout foundation general arrangement' shows a small section of the defence 'bull nose' towards the front of the site to be removed. We do not believe that removal of this section of flood defence will increase flooding to the surrounding area, and therefore we do not object in principle to the removal of this section of flood defence.

However, Figure 7: Proposed Landscaping/ SuDS Features in the submitted FRA shows a larger portion of the flood defence to be demolished and not just the 'bull nose' towards the front of the site, which would not be acceptable. The applicant needs to confirm that the only section of the flood defence to be removed will be the 'bull nose' of the defence. It may be the case that this specific figure has not been updated to reflect the other details submitted.

Overcoming our objection

The applicant should confirm, and ensure all submitted documents are consistent, that only the 'bull nose' end of the flood defence wall is proposed to be removed.

Section 2: Other technical comments

It is shown within the submitted 'Proposed external works layout sections & details' that the flood defence has a crest level of 6.800mAOD.

'External Works Section H' shows that the proposed external structure beam will be at a height of 7.493mAOD, which will provide sufficient space for raising the defence crest level to the TE2100 Plan for 2040 with the flood defence raised to no less than 6.900mAOD.

'External Works Section G' shows that the proposed external structure beam will be at a height of 7.071mAOD. Even though the space is limited between the crest level of the defence and the underside of the structure beam, there is, even though quite limited, space available to also raise the section of defence within this area to the TE2100 Plan for 2040 to 6.900mAOD during construction.

Section 3: Notes to the Local Planning Authority / Applicant

Note to the LPA

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

Note 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 £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