

Peter Price
Gravesham Borough Council
Civic Centre, Windmill Street,
Gravesend,
Kent,
DA12 1AU

Our ref: KT/2021/129036
Your ref: 20211383
Date: 13 November 2021

Dear Peter Price

Scoping request in respect of a proposed planning application for the installation of two additional bitumen tanks, load out gantry, the installation of a bitumen emulsion plant and alternative car parking

Land At Imperial Wharf, Clifton Marine Parade, Gravesend, Kent, DA11 0DY

Thank you for consulting us on the above proposal, based on the submitted information we would not object to the proposal in principle, however we would require further information to determine that the proposed installation of tanks, plant, parking and loading gantry would not detrimentally impact the Tidal Thames Flood Defence.

The site is bordered to the north by the Tidal Thames Flood Defence. The defence is predominantly formed of a sheet pile wall with a capping beam and ground anchors in addition to two flood gates, one of which has been temporarily decommissioned.

A previous inspection of the river wall discovered minor cracks and impact damage in the capping beam plus missing mastic sealant. There is a hole in the concrete wall that sits in front of the flood defence located at the splash zone and if water gets through this to the sheet pile it could cause erosion/corrosion of the sheet pile and erosion of the promenade material.

We require a confirmation of the design life of the development. Any submitted Flood Risk Assessment should then consider what works will be required to provide a flood defence which will protect the development for at least this period.

It is currently not known what the construction is underneath the existing walkway. As part of this application, we would require further inspection and investigation to determine how this may affect the overall stability and the impact to the steel sheet pile wall.

In 2019 the residual life was predicted as 10 years. The applicant must also demonstrate how the Tidal Flood Defence may be raised by 2040 as per the requirements of the Thames Estuary 2100 plan.

In addition to the current condition and residual service life of the Tidal Defence, we require any application to consider the following:

The site features existing tanks and other structures within close proximity to the flood defence. We would still seek setback from the defence line to avoid a worsening of the current situation which would further restrict access to the defence for maintenance and future raising.

Environment Agency
Orchard House Endeavour Park, London Road, Addington, West Malling, Kent, ME19 5SH
Customer services line: 03708 506 506
Email: enquiries@environment-agency.gov.uk
www.gov.uk/environment-agency



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Typically, we would require setback of 16 metres from a tidal flood defence (including buried elements such as tie rods). The application must provide offset distances with a consideration for buried elements such as ground anchors.

We would also require a consideration for the increased loading to the river wall and resulting from the new tanks.

There is a risk of vehicles, including HGVs, hitting the flood defence. Please provide details of measures which will be installed to reduce this risk.

We require details for how the new bitumen line will be installed and how this will interact with the flood defence.

Please be aware that much of the site, where it borders the tidal defence, is considered Flood Zone 3 although the site currently benefits from the Tidal Thames Flood Defences.

Flood Risk Activity Permit (FRAP)

In preparation for the required FRAP, we would require the application to be supported by a method statements. This must detail what construction activities would be carried out within 16 metres of the tidal flood defences

The Environmental Permitting (England and Wales) Regulations 2016 require a permit to be obtained for any activities which will take place:

on or within 8 metres of a main river (16 metres if tidal)

on or within 8 metres of a flood defence structure or culvert (16 metres if tidal)

on or within 16 metres of a sea defence

involving quarrying or excavation within 16 metres of any main river, flood defence (including a remote defence) or culvert

in a floodplain more than 8 metres from the river bank, culvert or flood defence structure (16 metres if it's a tidal main river) and you don't already have planning permission.

Please be aware that the Tidal Thames Defences are likely to incorporate buried elements which may extend further inland than the above ground river wall.

For further guidance please visit <https://www.gov.uk/guidance/flood-risk-activities-environmental-permits> or contact our National Customer Contact Centre on 03702 422 549. The applicant should not assume that a permit will automatically be forthcoming once planning permission has been granted, and we advise them to consult with us at the earliest opportunity.

We have reviewed the screening report compiled by pde consulting, especially with respect to ecology.

We feel that the ecological impact of the proposed works is low and therefore any considerations should be adequately covered within the PEA.

With particular reference to Chapter 4 (Environmental Effects) We agree that any application should be accompanied by a preliminary ecological assessment and would go further to impress upon the applicant the need to address some form of net environmental gain.

This can be achieved with the inclusion of green walls, permeable paving, SuDS schemes and enhancement of the river wall with timber fenders or intertidal planters to create viable aquatic substrate and habitat. Enhancements can be carried out in unison to any works deemed necessary to the river wall.

We feel that the ecological impact of the proposed works is low and therefore any considerations should be adequately covered within the PEA.

We will be happy to review again when this information has been provided

Should you require any additional information, or wish to discuss these matters further, please do not hesitate to contact me via the email below

Yours sincerely

David Sankar

Planning Advisor

Email KSLPLANNING@environment-agency.gov.uk