

Delegated Report

Planning & Listed Building Consent Applications

Planning Application No: 20221294

Location: Port Of London Authority London River House Royal Pier Road Gravesend

Description: 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

Applicant: Mr Michael Atkins

Site Visit Date: 27 January 2023

Submitted Documents/Plans

- Application form;
- Drawing no. PCC-BA-12-ZZ-DP-A-02 Rev. P2 S4 – Existing Location Plan;
- Drawing no. PCC-BA-12-ZZxT1-DP-A-0 Rev. P2 – Existing connection to Royal Terrace Pier – Plan and Section;
- Drawing no. PCC-BA-20-E1xT1-DP-A-) Rev. P2 – Connection to Royal Terrace Pier – North and South Elevations;
- Drawing no. PCC-BA-20-ZZxT1-DP-A-0 Rev. P2 – Connection to Royal Terrace Pier – Plan and Section;
- Drawing no. PCC-BA-21-L4xB1-DP-A-0 Rev. P2 – External Walls Level 4 South Elevation Bay Study;
- Drawing no. PCC-BA-21-L4xB2-DP-A-0 Rev. P2 – External Wall Level 4 North Elevation Bay study;
- Drawing no. PCC-BA-21-L4xS1-DP-A-0 Rev. P2 – External Walls Level 4 Sections;
- Drawing no. PCC-BA-21-ZZxB1-DP-A-0 Rev. P2 – Proposed External Walls Bay Study Typical Windows Type 1 Levels 1-3;
- Drawing no. PCC-BA-21-ZZxB2-DP-A-0 Rev. P2 – Proposed External Walls Bay Study Typical Windows Type 2 Levels 1-3;
- Drawing no. PCC-BA-21-ZZxB3-DP-A-0 Rev. P2 – Proposed External Walls Bay Study Typical Windows Type 3 Levels 1-3;
- Drawing no. PCC-BA-12-E1xT1-DP-A-0 Rev. P2 – Existing Connection to Royal Terrace Pier – North and South Elevations;
- Drawing no. PCC-BA-10-ZZ-DP-A-02 Rev. P2 – Proposed Location Plan;
- Drawing no. PCC-BA-12-E-DP-A-0 Rev. P1 – Existing South + North Site Elevation;
- Drawing no. PCC-BA-12-EE-DP-A-0 Rev. P1 – Existing East Elevation;
- Drawing no. PCC-BA-12-EN-DP-A-0 Rev. P1 – Existing North Elevation;
- Drawing no. PCC-BA-12-ES-DP-A-0 Rev. P1 – Existing South Elevation;
- Drawing no. PCC-BA-12-EW-DP-A-0 Rev. P1 – Existing West Elevation;
- Drawing no. PCC-BA-12-L0-DP-A-0 Rev. P1 – Existing Lower Ground Floor;
- Drawing no. PCC-BA-12-L1-DP-A-0 Rev. P1 – Existing Level 1;

- Drawing no. PCC-BA-12-L2-DP-A-0 Rev. P1 – Existing Level 2;
- Drawing no. PCC-BA-12-L3-DP-A-0 Rev. P1 – Existing Level 3;
- Drawing no. PCC-BA-90-ZZ-DP-A-2 Rev. P1 – Royal Terrace Pier paving;
- Drawing no. PCC-BA-12-R1-DP-A-0 Rev. P1 – Existing Roof Plan;
- Drawing no. PCC-BA-12-S1-DP-A-0 Rev. P1 – Existing Section AA;
- Drawing no. PCC-BA-12-ZZ-DP-A-01 Rev. P1 – Existing Site Plan;
- Drawing no. PCC-BA-20-EE-DP-A-0 Rev. P2 – Proposed East Elevation;
- Drawing no. PCC-BA-20-EN-DP-A-0 Rev. P2 – Proposed North Elevation;
- Drawing no. LNK-BA-12-ZZ-DP-A-0 Rev. P2 – Existing Link Building Levels 1&2;
- Drawing no. LNK-BA-20-ZZ-DP-A-0 Rev. P2 – Proposed Link Building Plans Levels 1 & 2;
- Drawing no. PCC-BA-10-ZZ-DP-A-01 Rev. P2 – Proposed Site Plan;
- Drawing no. PCC-BA-20-EW-DP-A-0 Rev. P1 – Proposed West Elevation;
- Drawing no. PCC-BA-20-L0-DP-A-0 Rev. P2 – Proposed Lower Ground Floor;
- Drawing no. PCC-BA-20-L1-DP-A-0 rev. P2 – Proposed Level 1;
- Drawing no. PCC-BA-20-L2-DP-A-0 Rev. P2 – Proposed Level 2;
- Drawing no. PCC-BA-20-L3-DP-A-0 Rev. P2 – Proposed Level 3;
- Drawing no. PCC-BA-20-L4-DP-A-0 Rev. P2 – Proposed Level 4;
- Drawing no. PCC-BA-20-R1-DP-A-0 Rev. P2 – Proposed Roof Plan;
- Drawing no. PCC-BA-20-S1-DP-A-0 Rev. P1 – Proposed Section AA;
- Drawing no. PCC-BA-20-S2-DP-A-0 Rev. 2 – Proposed Section BB;
- Drawing no. PCC-BA-12-L4-DP-A-0 Rev. P1 – Existing Level 4;
- Drawing no. PCC-BA-20-S3-DP-A-0 Rev. P2 – Proposed Section CC;
- Drawing no. PCC-BA-21-EE1-DP-A-0 Rev. P2 – Proposed External Wall East Elevation Cladding Types;
- Drawing no. PCC-BA-21-EN1-DP-A-0 Rev. P2 – Proposed External Wall North Elevation Cladding Types;
- Drawing no. PCC-BA-21-ES1-DP-A-0 Rev. P2 – Proposed External Wall South Elevation Cladding Types;
- Drawing no. PCC-BA-90-ZZ-DP-A-1 Rev. P1 – Bin Store;
- Drawing no. PCC-BA-21-EW1-DP-A-0 rev. P1 – Proposed External Wall West Elevation Cladding Types;
- Drawing no. PCC-BA-90-ZZ-DP-A-0 Rev. P2 – Proposed Site Surface Types;
- Drawing no. PCC-BA-20-ES-DP-A-0 Rev. P1 – Proposed South Elevation;
- Transport Statement;
- Upfront and Embodied Carbon Report;
- Heritage Statement;
- List of Documents and Plans;
- Flood Risk Assessment including Appendices;
- Construction and Environmental Management Plan;
- Planning, Design and Access Statement;
- Energy Statement;

Relevant Planning History

The application site has an extensive planning history, the most relevant are given below.

Reference	Description	Decision	Decision Date
20191041	Application for non-material amendment to planning permission reference number 20190222 to allow for the substitution of the large roof lights on the north and south elevations with Velux windows.	Permitted	28.10.2019
20190895	Application for non-material amendment to planning permission reference number 20190222 to allow the	Permitted	21.10.2019

	addition of a larger door onto the north balcony and omit the west roof lights on the north and south elevations.		
20190222	Conversion of existing archive area into an area for staff welfare and social activities, erection of a new terrace on the riverside elevation with additional windows and roof lights to the front and back elevations of the link section of the London River House; installation of photovoltaic solar panels on the roof of the London River House main block (east and west elevations); installation of a river water cooling plant system; alterations and improvements to the hard and soft landscaping to the front of the Royal Terrace Pier entrance and forecourt.	Permitted	17.05.2019
20190223	Application for Listed Building Consent for conversion of existing archive area into an area for staff welfare and social activities, erection of a new terrace on the riverside elevation with additional windows and roof lights to the front and back elevations of the link section of the London River House; installation of photovoltaic solar panels on the roof of the London River House main block (east and west elevations); installation of a river water cooling plant system; alterations and improvements to the hard and soft landscaping to the front of the Royal Terrace Pier entrance and forecourt.	Permitted	17.05.2019
19980214	Change of the external facing materials to the Port Control Centre fronting the River and erection of a 6m high flagpole on the roof.	Permitted	22.05.1998
19970463	Erection of extensions to the Port Control Centre at roof level on the north and south elevations to form rest room, kitchen, toilet accommodation and enlarged equipment room.	Permitted	24.12.1997
19890818	Erection of a part three storey and part four storey building linked to the existing Thames Navigation Service building to form car park at ground level with offices over.	Permitted	26.11.1990
19850491	Erection of extension at third floor level on the east elevation to form enlarged staircase enclosure installation of 4 no windows at first floor level on the southern elevation and internal alterations.	Permitted	24.09.1985

Development Plan

Gravesham Local Plan Core Strategy (September 2014):

- CS01 – Sustainable Development
- CS02 – Scale & Distribution of Development
- CS05 – Gravesend Town Centre Opportunity Area
- CS07 – Economy, Employment and Skills
- CS11 - Transport
- CS12 – Green Infrastructure
- CS18 – Climate Change
- CS19 - Development & Design Principles
- CS20 – Heritage and the Historic Environment

Gravesham Local Plan: First Review (1994)

- P3 – Vehicle Parking Standards
- TC2 – Listed Buildings

- TC3 – Development Affecting Conservation Areas
- TC7 – Other Archaeological Sites

Paragraph 33 of the NPPF (2021) sets out that policies within adopted local plans should be reviewed to assess whether they need updating at least once every five years, and should then be updated as necessary. Such reviews are also a legal requirement as set out in Regulation 10A of the Town and Country Planning (Local Planning) England Regulations 2012.

The Council undertook such a review in September 2019 and found that the adopted Local Plan Core Strategy is in need of a partial review in terms of Policy CS02, due to the increased need for housing since the Local Plan Core Strategy was adopted and the need to ensure that a sufficient land supply exists to meet this need. Whilst saved policies from the Local Plan 1st Review (1994) generally conform with the NPPF (2021), the Council will also seek to replace these.

Other material considerations

The Council has a statutory duty under Section 16 (2) of the Planning (Listed Buildings and Conservation Areas) Act 1990 to have special regard to the desirability of preserving a listed building or its setting or any features of special architectural or historic interest which it possesses when considering whether to grant listed building consent.

The Council has a statutory duty under Section 66 (1) of the Planning (Listed Buildings and Conservation Areas) Act 1990 to have special regard to the desirability of preserving the listed building or its setting or any features of special architectural or historic interest which it possesses when considering whether to grant planning permission.

Section 72(1) of the Planning (Listed Buildings and Conservation Areas) Act requires special attention to be paid to the desirability of preserving or enhancing the character or appearance of the conservation area.

National Planning Policy Framework (2021)

- 2 – Achieving Sustainable Development
- 4 – Decision-making
- 8 – Promoting healthy and safe communities
- 9 – Promoting sustainable transport
- 12 – Achieving sustainable development and well-designed places
- 14 – Meeting the challenge of climate change, flooding and coastal change
- 15 – Conserving and enhancing the natural environment
- 16 – Conserving and enhancing the historic environment

Supplementary Planning Guidance

- 2 - Residential layout guidelines including Housing Standards Policy Statement October 2015 Adopted 1996 – amended June (2020);
- SPG 4 - KCC Parking Standards (2006);
- Gravesend Riverside Conservation Area Character Appraisal (2009);
- Management Plan Gravesend Town Centre Conservation Areas (2009).

Consultations, Publicity and Representations

Consultees

KCC Flood & Water Management

As Lead Local Flood Authority, Kent County Council are required to provide technical advice and guidance on the surface water drainage strategies, designs and maintenance arrangement put forward by developers to any new major development.

According to the Town and Country Planning (Development Management Procedure) (England) Order 2010, major development is defined in planning as any development involving any one or more of the following:

- a) The winning and working of minerals or the use of land for mineral-working deposits; b) Waste development;
- c) The provision of dwelling houses where:
 - i. The number of dwelling houses to be provided is ten or more; or
 - ii. The development is to be carried out on a site having an area of 0.5 hectares or more and it is not known whether the development falls within sub-paragraph (c) (i);
- d) The provision of a building or buildings where the floor space to be created by the development is 1,000 square metres or more; or
- e) Development carried out on a site having an area of one hectare or more.

The application under the above reference number therefore falls outside the definition of major development and also falls outside of KCC's remit as statutory consultee.

Notwithstanding the above, please feel free to contact us again if you consider there to be local flood risk issues on this site that may require further consideration.

KCC Heritage

Advises that the landscaping works will be unlikely to have any significant below-ground impacts, being limited to items such as new street furniture and paving, would not recommend the need for any archaeological mitigation such as a watching brief.

Environment Agency (Latest comment)

Thank you for consulting us on 1 March on additional information which responds to our objection to the proposal. Following further consideration and a follow up explanatory meeting **we can remove our objection on the basis that the following flood risk and biodiversity planning conditions are applied to any planning permission granted.**

Flood Risk

The proposed development will only meet the National Planning Policy Framework's requirements in relation to flood risk if the following planning conditions are included.

Condition 1

Before any part of the site, which is to be redeveloped under this planning application, can be occupied, a condition assessment of the site's tidal Thames flood defence must be submitted to, and approved in writing by, the local planning authority in consultation with the Environment Agency. As an absolute minimum, this must include:

- An assessment of the sheet pile's section loss with sufficient coverage to reasonably demonstrate that the worst-case corrosion has been determined.
- A consideration for the worst-case bending moment of the flood defence.
- Testing of the site's flood defence buried elements, such as tie rods.
- The condition assessment should be submitted as a report with a stated remaining service life for the flood defence.

Reason

To prevent an increased risk of flooding, to ensure that the development and the surrounding area is appropriately protected from flooding, in line with the National Planning Policy Framework (NPPF).

Condition 2

Before any part of the site, which is to be redeveloped under this planning application, can be occupied, the applicant must carry out such works as to provide a minimum 20-year service life for the site's tidal flood defence without the need for further intrusive works during this time. These repair works must be detailed in a report must be submitted to, and approved in writing by, the local planning authority in consultation with the Environment Agency. The extent of the proposed works should be determined based on the condition assessment.

Reason

To prevent an increased risk of flooding, to ensure that the development and the surrounding area is appropriately protected from flooding, in line with the National Planning Policy Framework (NPPF).

Flood Risk Activity Permit (FRAP) Informative

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 riverbank, culvert, or flood defence structure (16 metres if it's a tidal main river) and you don't already have planning permission.

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. In preparation for the required FRAP, we would require the application to be supported by a detailed method statement.

It is likely that a FRAP would be required for the demolition work. We would require for the applicant to submit a method statement for these works with a consideration for any possible interaction with buried elements that form part of the tidal flood defence (such as tie rods).

Future Thames Barrier Informative

The Thames Estuary 2100 Plan (the Plan) sets out how we and our partners can work together to manage tidal flood risk in the Thames Estuary, from now and into the next century. It is an adaptive plan, ensuring current standards of flood protection provided by the existing tidal defence system are maintained or improved taking into account the effects of climate change e.g. sea level rise. We expect the Thames Barrier to continue to protect London from tidal flooding up until 2070, but over the longer term the Plan, published in 2012, sets out the strategic direction and several options for managing tidal flood risk in the Thames Estuary.

Beyond 2070, the long term options to manage tidal flood risk include upgrading the existing barrier at Woolwich, 2 potential locations for a replacement barrier (Gravesend Reach or Long Reach) or flood storage.

Currently, all options continue to be investigated and assessed given that the decision on a preferred option is not planned until about 2040 when such a decision will be informed by the data and information available at the time.

This ongoing work is something the developer should be aware of as their site may be impacted in the future. We will contact the developer and landowners in the future should the Gravesend Reach area be taken forward as the preferred option. We would encourage the developer to regularly check Gov.uk for further info and up to date information.

Biodiversity

The proposed development will only meet the National Planning Policy Framework's requirements in relation to biodiversity if the following planning condition is included.

Condition 3

Prior to the commencement of development approved by this planning permission the provision of an up-to-date preliminary ecological appraisal and enhancement opportunities shall each be submitted to and approved, in writing, by the local planning authority. Enhancements should follow the principles of net gain as set out in the Department for Environment Food and Rural Affairs 3.0 metric and follow National Planning Policy guidance with particular reference to paragraphs 179-180.

Reasons

To ensure the protection of wildlife and supporting habitat. Also, to secure opportunities for enhancing the site's nature conservation value in line with national planning policy.

Historic England

Thank you for your letters of 18th January 2023 regarding the above applications for planning permission and listed building consent. Historic England provides advice when our engagement can add most value. In this case we are not offering advice. This should not be interpreted as comment on the merits of the applications.

We suggest that you seek the views of your specialist conservation and archaeological advisers. You may also find it helpful to refer to our published advice at <https://historicengland.org.uk/advice/find/>

It is not necessary to consult us on these applications again, unless there are material changes to the proposals. However, if you would like advice from us, please contact us to explain your request.

Southern Water

Please see the attached extract from Southern Water records showing the approximate position of our existing public foul sewers within the development site. The exact position of the public assets must be determined on site by the applicant in consultation with Southern Water before the layout of the proposed development is finalised.

Please note:

- The 150 mm public foul sewer requires a clearance of 3 metres on either side of the public foul sewer to protect it from construction works and to allow for future maintenance access.
- No development or tree planting should be carried out within 3 metres of the external edge of the public foul sewer without consent from Southern Water.
- No soakaways, swales, ponds, watercourses or any other surface water retaining or conveying features should be located within 5 metres of public or adoptable gravity sewers.
- All existing infrastructure should be protected during the course of construction works.

Please refer to: southernwater.co.uk/media/3011/stand-off-distances.pdf

Please Note: There is a private communication crossing the development site.

It is possible that a sewer now deemed to be public could be crossing the development site. Therefore, should any sewer be found during construction works, an investigation of the sewer will be required to ascertain its ownership before any further works commence on site.

Southern Water requires a formal application for a connection to the public foul sewer to be made by the

applicant or developer.

To make an application visit Southern Water's Get Connected service: developerservices.southernwater.co.uk and please read our New Connections Charging Arrangements documents which are available on our website via the following link: southernwater.co.uk/developing-building/connection-charging-arrangements

The supporting documents make reference to drainage using Sustainable Drainage Systems (SuDS).

Under certain circumstances SuDS will be adopted by Southern Water should this be requested by the developer. Where SuDS form part of a continuous sewer system, and are not an isolated end of pipe SuDS component, adoption will be considered if such systems comply with the latest Design and Construction Guidance (Appendix C) and CIRIA guidance available here:

water.org.uk/sewerage-sector-guidance-approved-documents/

[ciria.org/Memberships/The SuDS Manual C753 Chapters.aspx](https://ciria.org/Memberships/The_SuDS_Manual_C753_Chapters.aspx)

Where SuDS rely upon facilities which are not adoptable by sewerage undertakers the applicant will need to ensure that arrangements exist for the long-term maintenance of the SuDS facilities. It is critical that the effectiveness of these systems is maintained in perpetuity. Good management will avoid flooding from the proposed surface water system, which may result in the inundation of the foul sewerage system.

Thus, where a SuDS scheme is to be implemented, the drainage details submitted to the Local Planning Authority should:

- Specify the responsibilities of each party for the implementation of the SuDS scheme.
- Specify a timetable for implementation.
- Provide a management and maintenance plan for the lifetime of the development.

This should include the arrangements for adoption by any public authority or statutory undertaker and any other arrangements to secure the operation of the scheme throughout its lifetime.

The Council's technical staff and the relevant authority for land drainage consent should comment on the adequacy of the proposals to discharge surface water to the local watercourse.

The design of the proposed basements and on site drainage system should consider the possibility of surcharging within the public sewerage system in order to provide adequate protection to basements from the risk of flooding.

Neighbouring properties

20221294 - 16 surrounding properties were consulted plus site and press notices – overall consultation expiry date was 17.02.2023 – no responses received.

20221295 – Site and press notices – overall consultation expiry date was 17.02.2023 – no responses received.

Officer's Analysis

The application site consists of the Port of London Authority's (PLA) collection of five buildings made up of London River House, the Link building, Port Control Centre building, Royal Terrace Pier and Alexandra

House.

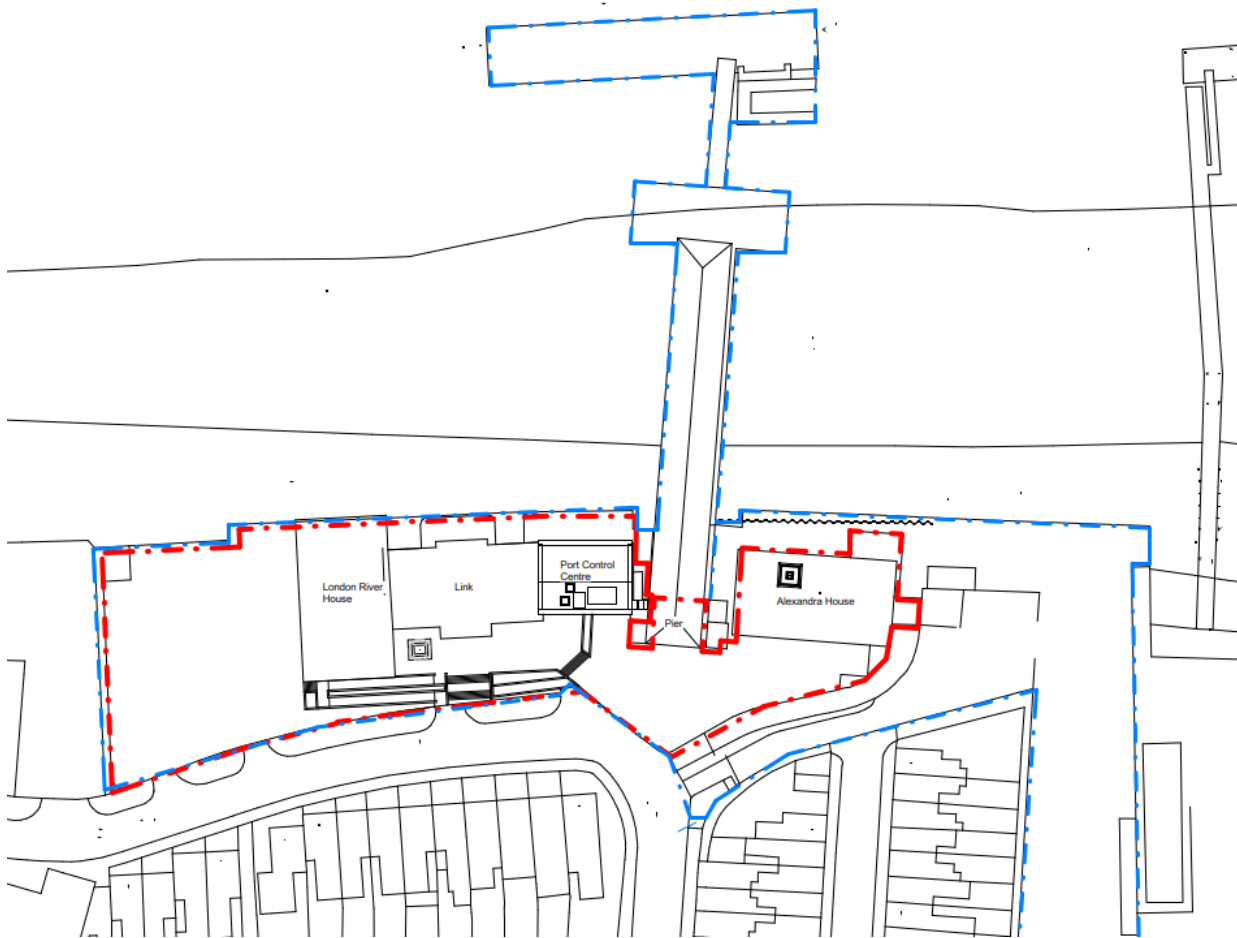
Royal Terrace Pier is a grade II listed building and the site is located in the Riverside Conservation Area, an Area of Archaeological Potential, Flood Zone 2 and Gravesend Town Centre Opportunity Area. Gravesend Blockhouse to the west of the application site is a Scheduled Ancient Monument.

This proposal relates primarily to the extension and refurbishment of the Port Control Centre (PCC) building. The PCC building is a four storey building plus rooftop structure which houses the PLA's Vessel Traffic Services (VTS) and radar equipment for the PLA along with ancillary office areas. The VTS department oversees the safety of navigation of some 600 sq. miles of waterway spanning 95 miles from Teddington to the North Sea on a 24 hour basis, 365 days a year. The proposal to extend and modernise the PCC building has come about to ensure that it can continue to act as the main base of operations for the PLA both now and in the long term. The building will also house an additional 10 employees who will be re-locating from the PLA's Thames Barrier Navigation Centre in Woolwich. It is therefore proposed to extend the building with a new storey on top.

The proposal also includes the relocation of the communications tower from the PCC building to the roof of Alexandra House.

It is also stated the existing PLA buildings are considered to present a cluttered and confusing face to the town with a mix of different scales, materials and designs and with access to the main door being via steps and car parking, services entrances and bin stores dominating the frontage. The proposal also therefore includes extensive areas of landscaping to unify the PLA ensemble and rectify the access and perception issues at the front of the site, removal of seven parking spaces from the front of London River House and the relocation of the existing waste collection area to the London River House car park to the west of the site.

The application site is shown in the below image:



The collection of PLA buildings are shown in the below image:



The principle issues are as follows:

- Principle of Development
- Design, Character and Appearance including Heritage
- Amenity of Neighbouring Properties
- Parking and Highway Safety
- Flooding
- Ecology and Biodiversity
- Archaeology

Principle of Development

The proposal relates to the refurbishment and extension of the existing PCC building and wider landscaping and refurbishment works across the PLA site. In regards to the principle of development, Policy CS02 of the Gravesend Local Plan Core Strategy (LPCS) prioritises development in the urban area as a sustainable location for development. It seeks to achieve this by promoting regeneration by prioritising redevelopment and recycling of previously developed land. The site lies within Gravesend Town Centre Opportunity Area (sub-area 3.4 East of Town Centre). Policy CS05 (LPCS) states that the Gravesend Town Centre Opportunity Area will be the principal focus for town centre related economic and social activity in the Borough. The proposal to extend and refurbish an important employment site in the town centre along with the specific important functions that the PLA carry's out, means that the proposal is considered acceptable in principle.

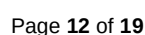
Design, Character and Appearance including Heritage

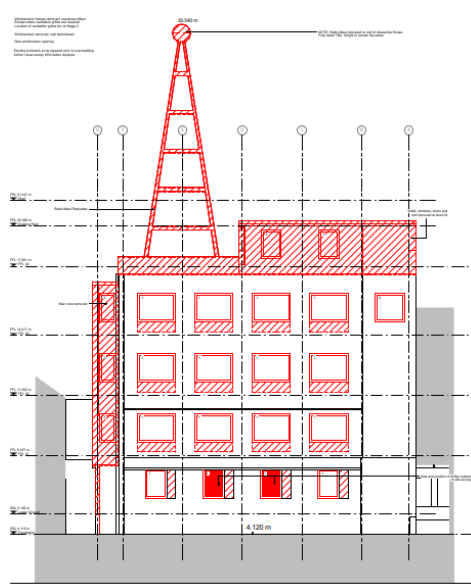
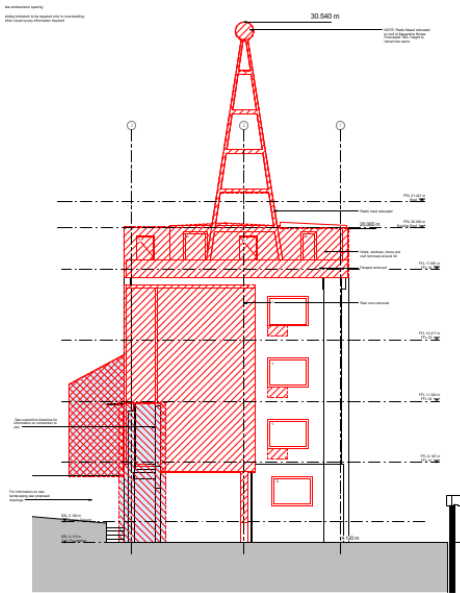
The key consideration is whether the proposals would protect the setting of the grade II listed Royal Terrace Pier and preserve or enhance the character and appearance of the Riverside Conservation Area.

Turning to the proposed extension and refurbishment of the PCC building first which is the main part of the

The north elevation of the new storey would have windows which would be set back and at an angle to reduce glare for the VTS operators. There would be solid panels above this to allow for the mounting of VTS screens above the windows. The south elevation of the new storey would be at a lower level with smaller windows in order to reduce overheating and has been done to provide a consistent window to solid arrangement as per the north elevation. There would be a small solid section below the windows to allow for desks to be placed against the windows. The east and west flank elevations would be solid panels with no openings.

Existing Elevations

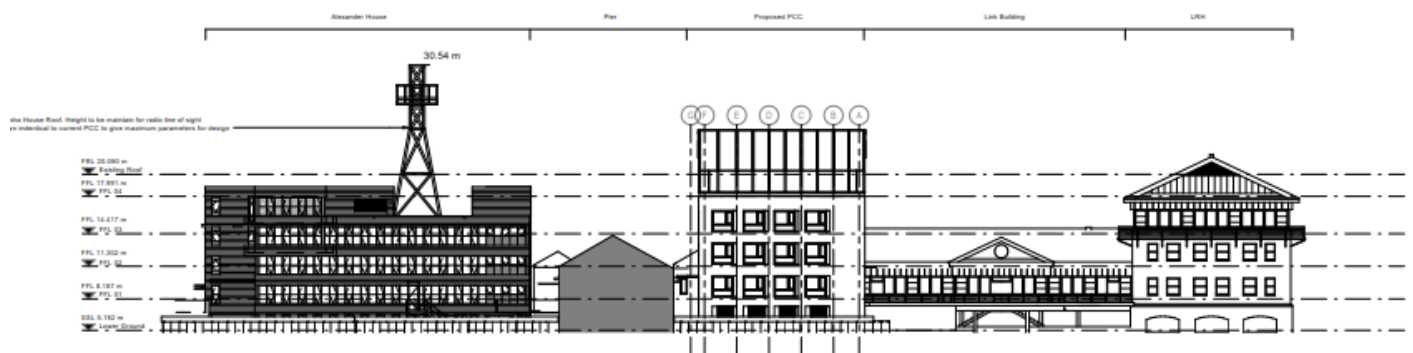




Proposed Elevations



1 South Elevation 1 : 200



2 North Elevation 1 : 200



Concept Illustration



The proposed new storey on the PCC building is of a unique design in terms of the surrounding character but its form very much follows its function. The size and positioning of the windows and solid panel sections is determined by the use of the building. The north elevation of the new storey is higher than the south elevation due to the need to have large windows to afford views along the river in both directions. The south elevation is shorter as there is not such a need for high windows in that section but windows are proposed to ensure a balance between the north and south elevations in terms of the fenestration. The bulk of the new storey is reduced as much as possible with the 'M' style roof. Although different, the design very much follows function and it is considered that the proposal will turn the PCC building into something more of a landmark building for the river and this area of Gravesend riverside than is currently the case. It is considered that overall subject to conditioning materials for the new storey (and the refurbished elevations of the existing building), the proposed new storey and refurbishment of the PCC building will respect the character of the host building and would not harm the character of the surrounding area. Due to the proposed new storey and refurbished elevations being of sympathetic design to the PCC building and the surrounding area, it is also deemed that the proposed works would protect the setting of the adjacent

Grade II listed Royal Terrace Pier to the east and would preserve the character and appearance of the Riverside Area.

The replacement windows will be aluminium, the existing windows are aluminium and therefore the material is considered acceptable. Typical window details have been submitted which appear sympathetic and similar to the existing.

The other works consist of moving the communications tower from the PCC building which is currently located on the eastern side of its flat roof to the roof of Alexandra House, a 1970s building where it would be located in a slightly-off-centre location. The communications tower is a vitally important functional element of the PLA's occupation at the Gravesend site and supports a number of active systems. The proposal is to remove the existing tower from the PCC building (which is to receive a new storey on top of the building) and relocate the tower. A number of locations were considered for the tower and Alexandra House has been chosen as the most suitable option with the least harm. The highest point of the tower would remain 30.57m above sea level and will be a maximum of 4.75m wide at its base but the actual design of the tower would be dealt with by planning condition. The existing tower has been shown in the proposed drawings but this may be smaller than shown, but it would not exceed the existing parameters.

As can be seen from the existing and proposed elevation views earlier in this report, the difference in locating the communications tower on Alexandra House would be minimal. The tower is already a very prominent feature on top of the PCC building which is the vista at the end of Royal Pier Road. The relocation of the tower onto Alexandra House to the east, which is at a slightly lower level than the PCC building and not in the direct vista at the end of Royal Pier Road, would mean a reduction in the prominence of the tower. The tower is said to be of a smaller scale than the existing one, and certainly no larger.

Overall it is considered the relocation of the tower from where it is currently positioned on the PCC building to the roof of Alexandra House to the east would have a neutral impact on the character of the host building Alexandra House and the character of the area given it is just being moved from one building to another which is a modern 1970s building of no particular architectural merit. It would not impact on the setting of listed Royal Terrace Pier which is located between the two and would still preserve the character and appearance of the Riverside Conservation Area. A condition would be needed to secure details of the exact size and appearance of the new tower as only general information has been submitted with the application. It is shown to be the size and appearance of the existing tower in the plans but it is said this would be the maximum size and it is likely the tower would be smaller and that the design would be developed further through condition stage.

It is stated in the Design & Access Statement that during the construction stage both the existing and proposed communications towers will be in place for 24 months to allow continuous operation of VTS services. This was queried with the applicant due to the length of time and he has confirmed that once the new tower has been installed on Alexandra House, the existing tower will need to remain in place for at least 15 months in order to enable the new tower to be installed, various IT infrastructure and services to be transferred from and various testing requirements to ensure the new tower is fully operational without issue. It is a rigorous testing regime due to the fundamental requirement to ensure that the navigational system does not have any issues and can operate effectively. The need for both towers to exist for a period of time is completely understood. Whilst 15 months is still a long time, given the visual impact that two towers will have, it is an improvement on the originally stated 24 months in the Design & Access Statement and the applicant is considered to have provided sufficient justification for why 15 months is necessary. As such in order to ensure that the existing tower is removed when it can be in order to ensure there would not ever be the situation where both towers would remain going forward (and in the event that the new storey to the PCC building did not take place in which case the existing tower would not need to be removed) it will be necessary to condition that the existing tower will be removed within 15 months of the new tower being in operation and shall not be reinstated or relocate elsewhere on the site. The existing tower will be removed sooner if the opportunity arises.

The proposal also includes extensive areas of landscaping to unify the PLA ensemble and rectify the

access and perception issues at the front of the site. Within the Design & Access statement it is stated that the existing frontage within the curtilage of the PLA buildings is in poor condition in respect of the pavement and street furniture etc. with an unclear entranceway dominated by parking and waste collection area. The proposal is to clear away unnecessary elements in front of the PLA site and create a unified landscape improving legibility, hierarchy and a sense of civic public realm to the site. The proposed landscaping includes a number of works including creation of sloped ground, stairs and feathered step access, tiered planters, re-surfacing, re-location of bin store to corner of parking area west of London River House, removal of seven parking spaces from the front of London River House, new bollards to replace existing concrete bollards, planted strips in front of ramps and re-location of decorative plaque and information board to in front of the link building. All existing trees are to be retained. The works are subject to condition to secure full details, and are considered positive which will enhance the environs of the site creating a more welcome, accessible and uniformed appearance.

A new lighting scheme is also proposed in the new landscape elements to light routes for safe access and security which could mix with more decorative elements of lighting the buildings including lighting the PCC building at the base and also having concealed lighting detail in the ridge of the new storey extension to that building. Subject to details for further information this is considered acceptable.

There is existing signage on the north and south elevations of the PCC building – it is proposed to have some new replacement signage and further signage is also proposed on the hard landscaping planters. Subject to details of the proposed signage, it is considered acceptable.

There are also works proposed to the existing link between the PCC building and Royal Terrace Pier which is a brick built extension that was added to the PCC building to allow Pilots direct access to the Pier. A section of the link is to be demolished which houses a secondary staircase which is no longer required. It is stated in the Heritage Statement that this will help to create more separation between the pier and the PCC building, which will serve to enhance the setting of the pier and views of it by better 'framing' the pier from Royal Pier Road. The majority of the structure and external walls are to be retained, the walls and slab connecting directly to the Pier are to be retained. The existing wall will be insulated and rendered to match the refurbished PCC building. Render will finish 100mm short of the pier structure, leaving a shadow gap between the PCC building and the pier. Walls and roof will be extended above the new landing and new steps will be built over existing stair to mitigate the increase in finished floor levels. The window will be replaced to fit the existing opening. The external access to the plant areas at the north side of the PCC building, below the connection to the pier, will be removed and the terrain will be filled to match the level of the pier and its surroundings.

As the link between the PCC building and the pier is a later addition and not commensurate with the age of the pier and does not appear of any architectural or historic merit, it is considered that subject to conditions regarding materials etc. the proposed works would not harm the setting of the Grade II listed Royal Terrace Pier.

Overall in respect of design, character and appearance including heritage it is considered that the proposal would protect the architectural and historic interest of the grade II listed Royal Terrace Pier and would preserve and in some respect enhance the character and appearance of the Riverside Conservation Area. In this respect the proposal would be compliant with Policies CS19 and CS20 (LPCS) and saved Policies TC2 and TC3 (LPFR).

Amenity of Neighbouring Properties

The proposal includes a new storey on top of the existing PCC building which would change it from a four storey building to a five storey building. There are properties opposite in Royal Pier Road which are two storeys in height. The PCC building is set well back from the back edge of the pavement and the lower ground floor level is below pavement level. Due to the distance of the PCC building from the front elevation of the properties opposite in Royal Pier Road and the scale of the development it is considered there would be no harmful impact on their amenity in terms of overshadowing, loss of outlook or overbearing. There would be windows in the south elevation of the new storey but these would offer no more level of visibility in

terms of overlooking than the windows in the below storeys of the building. Furthermore, the building is an operational building used by the PLA and not in residential use. In respect of the amenity of neighbouring properties the proposal is therefore considered compliant with Policy CS19 (LPCS).

Parking and Highway Safety

The proposal involves the removal of seven parking spaces from in front of London River House in order to carry out the proposed landscaping works. In addition there will be one space lost from moving the bins from in front of London River House to the south-west corner of the car park to the east of London River House. There are currently 171 parking spaces across the PLA's site, with the loss of 8 spaces this will reduce to 163 parking spaces. It is considered that given the amount of parking spaces that would still remain which would be substantial and the town centre location of the site, the proposal would not cause any harm in respect of parking provision or highway safety. In respect of these matters the proposal is therefore considered compliant with Policy CS11 (LPCS) and saved Policy P3 (LPFR).

Flooding

The site is located in Flood Zones 2 & 3. The Environment Agency (EA) originally objected to the proposal in respect of flood risk and Fisheries, Biodiversity and Geomorphology. A meeting was held between the Environment Agency, the Port of London Authority and the Local Planning Authority to discuss the objection. The PLA submitted some additional information in preparation for this meeting. Following the additional information and the meeting the EA submitted fresh comments advising that they removed their objection on the basis that the flood risk and biodiversity planning conditions that they provide are applied to any planning permission granted. As such, subject to conditions it is considered the proposal would be acceptable in respect of flooding and in this respect the proposal would be compliant with Policy CS18 (LPCS).

Ecology and Biodiversity

The Environment Agency have advised that the proposal would only meet the requirements of the NPPF (2021) if a condition is attached requesting a preliminary ecological appraisal and enhancement opportunities and that this is required to be prior to the development commencing. The applicant has been asked if they agree to this condition and they have confirmed on 19/04/2023 that they do. Subject to this condition it is therefore considered the proposal would be acceptable in respect of Policy CS12 (LPCS) and section 15 of the NPPF (2021).

Archaeology

The proposal involves re-surfacing and hard and soft landscaping works but no substantial below ground works to impact in respect of archaeology. As such no issues are considered to be raised in respect of archaeology and in this respect the proposal is considered compliant with saved Policy TC7 (LPFR).

Any Other Material Planning Considerations

Southern Water comments – No objections are raised, their comments can be added as an informative should permission be forthcoming.

A Construction and Environmental Management Plan has been submitted with the application and this will be conditioned to be adhered to, to ensure minimal impact on the surrounding properties, residents and the wider environment.

Conclusion & Recommendation

The proposal subject to a number of conditions would be acceptable in respect of design, character and appearance and would protect the architectural and historic interest of the grade II listed Royal Terrace Pier, would preserve and in some cases enhance the character and appearance of the Riverside

Conservation Area, would not harm the amenity of neighbouring properties and would not cause harm in respect of parking and highway safety, flooding or archaeology. As such subject to conditions the proposal is compliant with local and national planning policy.

Recommendation:

20221294 - Permission

20221295 – Permission

(For detailed conditions / reasons for refusal and informatives, see draft Decision)

Case Officer:	Ms Rebecca Harrison	Team Leader:	Miss Faye Hobbs
Signed:	<i>Rebecca Harrison</i>	Signed:	
Dated:	20th April 2023	Dated:	20 April 2023