

Planning and Heritage Statement

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1. Introduction

This supporting document has been prepared by the applicant on behalf of The Steam Tug Cervia Preservation Trust. Its purpose is to assist officers at Gravesham Borough Council (GBC) in their consideration and determination of the following application.

“Application for a Lawful Development Certificate for the mooring of the historic steam tug Cervia at St Andrews Quay, Royal Pier Road, Gravesend, DA12 2BD, and its proposed use as a heritage museum under Use Class F1, in accordance with Section 192 of The Town and Country Planning Act 1990.”

We consider that an application for a Lawful Development Certificate is the appropriate procedure in this instance. The Planning Portal states that an application for a Lawful Development Certificate (LDC) should be used to establish whether a proposed use of buildings or other land, *or some operations proposed to be carried out in, on, over, or under land*, would be lawful. This is particularly relevant, since the vessel and the operations will be carried out on or above the river bed, rather than on a specific terrestrial piece of land. An application for an LDC is also used in cases involving intensification of use where the precise nature of the existing use is difficult to describe, such as secondary uses, mixed uses, intensification, and/or sub-division of the planning unit.

The following plans and documentation are provided to support this application.

- This Planning and Heritage Statement
- St Andrews Quay plan – existing arrangement
- St Andrews Quay Plan – option 1 (Cervia outlined in red)
- St Andrews Quay Plan – option 2 (Cervia outlined in red)
- St Andrews Quay elevations and sectional view - as existing
- St Andrews Quay elevations – proposed options at low tide
- St Andrews Quay elevations – proposed options at very high tide
- Aerial view – as existing
- Aerial illustration – proposed option 1 and proposed option 2
- Cabinet minutes and decision to install moorings and designate St Andrews Quay

2. The Proposal

The proposal is to moor the historic, former Gravesend-based steam tug Cervia alongside St Andrews Quay, and to open the vessel to the public to operate as a heritage museum under Use Class F1. The vessel will float on the river at high tides and rest on the river bed at all other times. Access to the vessel will be by a removable gangway connected to one of the existing purpose-built access platforms on the paved walkway at St Andrews Quay.

In order to accommodate Cervia, it will be necessary to reposition the former Trinity House lightship LV21 which is already berthed alongside St Andrews Quay. This application is not concerned with the introduction of LV21 at St Andrews Quay in 2017 or its operation as an arts, culture, education, and heritage venue, which is assumed to be Use Class F1. That is a separate planning matter to which this applicant is not a party.

There are two principal options for the positioning of Cervia at St Andrews Quay, which are outlined below and shown in the drawings. Since Gravesham Borough Council is the owner and operator of St Andrews Quay, we are content for Gravesham Borough Council to determine the preferred option, which can be subject to a planning condition.

3. Application Site

Whilst the vessel itself will either float in the river or sit on the river bed, access to and from the vessel will be by a removable gangway connected to the paved walkway in St Andrews Gardens, using one of the existing purpose-built raised access platforms along the quayside. Whilst St Andrews Gardens is primarily designed for leisure and recreation, on 10th January 2011 Gravesham Borough Council made the decision to install mooring facilities on the quayside at a cost of £20,500, and to enter into an agreement for the management of the moorings, henceforth to be known as St Andrews Quay.

4. Planning History

Reference	Description	Year	Status
20180049	Application for the approval of conditions 3 & 4 attached to planning permission reference no. 20170567 relating to the details of a replacement tree and an archaeological watching brief. St. Andrews Gardens Off Crooked Lane Gravesend Kent	Jan 2018	Approval of details
20170567	Installation of statue in St. Andrew's Garden including the removal of one tree. St. Andrews Garden Off Crooked Lane Gravesend Kent	Jun 2017	Permitted
20131066	Erection of a statue. St Andrews Gardens Royal Pier Road Gravesend Kent	Nov 2013	Permitted
20120931	The Heritage Quarter Land Between West Street, Bath Street, Royal Pier Road and Queen Street, Excluding the High Street Gravesend Kent <i>(makes reference to St Andrews Gardens and the walkway between Elizabeth Gardens and Town Pier)</i>	Nov 2012	Permitted
Cabinet	Establishment of St Andrews Quay and moorings	Jan 2011	Decision
20080696	The Heritage Quarter Land Between West Street, Bath Street, Royal Pier Road & Queen Street, Gravesend Kent <i>(makes reference to St Andrews Gardens and the walkway between Elizabeth Gardens and Town Pier)</i>	Jul 2008	Refused

5. Planning Policy Context

The following planning legislation and policy documents have been taken into consideration in the preparation of this application.

Primary Planning Legislation

The Town and Country Planning Act 1990

Schedule 192

The Town and Country Planning (Development Management Procedure) (England) 2015

Article 39

National Planning Policy Framework (NPPF) (adopted July 2021)

<u>Chapter</u>	<u>Paragraph</u>
Chapter 2: Achieving sustainable development	8, 10, 11
Chapter 4: Decision making	38, 47
Chapter 7: Ensuring the vitality of town centres	88
Chapter 8: Promoting healthy and safe communities	93
Chapter 9: Promoting sustainable transport	110, 111
Chapter 16: Conserving and enhancing the historic environment	197, 202, 206, 208

Gravesham Local Plan Core Strategy

<u>Policy</u>	<u>Paragraph</u>
Policy CS01: Sustainable Development	4.1.4
Policy CS05: Town Centre Opportunity Area	4.6.2; 4.6.12; 4.6.32; 4.6.36
Policy CS09: Culture and Tourism	5.3.8; 5.3.9; 5.3.11; 5.3.13
Policy CS20: Heritage and the Historic Environment	5.16.2, 5.16.3; 5.16.5; 5.16.9

Gravesham Local Plan First Review Saved Policies

Policy TC3: Development affecting Conservation Areas

Supplementary Planning Documents

SPG4: Kent Vehicle Parking Standards	Paragraph 30, Table 1
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6. St Andrews Gardens and Heritage Appraisal

St Andrews Gardens is located in the north eastern corner of High Street & Queen Street Conservation Area, and immediately adjacent to Riverside Conservation Area to the east. Covering an area of around 0.25 hectare, it is mainly laid to lawn with mature trees, and with a pleasant paved promenade along the northern edge adjacent to the quayside.

St Andrews Gardens itself is a relatively recent development. Historically, the area which is today covered by the gardens was never used for recreational purposes. The area was densely packed with water side inns, industrial buildings and warehouses. The buildings were cleared in the 1950s and 1960s to create the leisure space now known as St Andrews Gardens, affording views of the river, the Town Pier, and across to Tilbury.

To the west of St Andrews Gardens is the Three Daws public house and the Town Pier. The Three Daws is a Grade II listed building with strong connections to the river. Early records indicate that a public house was located at this site as early as the 15th century. The Three Daws is the oldest public house in the town and reportedly the oldest pub in Kent. The interior is decorated with maritime photos, artwork, and artifacts. With a mixture of timber framing, weatherboarding and tiled roof, the building is a popular and well-known riverside landmark in Gravesend.

Dating back to 1834, the Grade II listed Town Pier was designed by William Tiernwey Clark, and constructed by William Wood of Gravesend, and is the oldest cast-iron pier in the world. It is also the southern terminal for the Gravesend/Tilbury ferry, and is Gravesend's principal

connection to the River Thames. It was restored in 2001/02, and a floating pontoon was added in 2012, which is used by visiting historic vessels such as Thames barges and the paddle steamer Waverley. Thames Clippers by Uber Boats use the pier for leisure trips to Greenwich and London and expect to introduce regular services from 2025.

To the east of St Andrew's Gardens is Bawley Bay and St Andrews Art Centre. Bawley Bay was once the heart of Gravesend's fishing industry, with over a hundred "Bawley" shrimp boats working from this small stretch of river. It was also the point where local Thames watermen serviced the ships and tugs in the river off Gravesend, and where cargo and passengers were ferried to and from the shore.

Dating from 1870/71, the Grade II listed St Andrews Art Centre was originally St Andrews Waterside Mission, a church built to serve the waterside community and the many people who inhabited the hulks and barges moored offshore. With its large stone bellcote towering above the gable, it is an iconic feature of Gravesend's rich maritime heritage.

All of these are valued heritage assets, integral to Gravesend's maritime history, and make a positive contribution to the character of the area.

In 2014, a statue of Squadron Leader Mahinder Singh Puji by English sculptor Douglas Jennings was erected in St Andrews Gardens, and in 2018 a statue of the late Queen Elizabeth II, also by Douglas Jennings, was erected in nearby Elizabeth Gardens.

To the south of St Andrews Gardens, the grassed area rises to the flood defence wall, with a walkway linking to the A226 Crooked Lane beyond, and is overlooked by the 8-storey Charter development currently under construction.

There are no proposed changes to the landscape or uses of St Andrews Gardens.

7. St Andrews Quay

In January 2011, Gravesham Borough Council decided to install vessel mooring facilities along the northern edge of St Andrews Gardens. The mooring facility was henceforth to be known as St Andrews Quay. The quayside is approximately 78.2 metres in length, from the raised flood defence wall and steps leading up and over the wall towards the Three Daws in the west, to Bawley Bay in the east. It is laid with paving slabs, with a 300mm high by 600mm wide concrete wall fronting on to the river and Bawley Bay. Low cast-iron mooring pillars are fixed to the top of this wall to facilitate the mooring of vessels. This 600mm wide wall turns south at the Bawley Bay end, effectively reducing the length of the paved area to 77.6 metres.

A painted metal bar fence approximately 1 metre high is mounted to the top of the wall at the paved area side, providing a barrier approximately 1.3 metres high separating the paved area from the river frontage. There are three vessel access points along the quayside. Each access point is approached by a concrete ramp and platform, level with the top of the concrete wall.

On the northern side of the wall, the quay drops by around 4 metres to the silt/shingle river bed. The tidal range between low tide and high tide is typically between 5.5 metres and 6.6 metres at Gravesend. At low tide, the river edge retreats from the quay, leaving an expanse of mud and shingle exposed. At high tide, the river level rises to within a metre of the top of the concrete wall. Spring tides occur twice a lunar month, when the sun and moon are in alignment. On these occasions, the river level approaches the top of the wall. On infrequent occasions, such as when exceptionally high spring tides and certain wind conditions coincide, the river level rises above the concrete wall, flooding the lower part of St Andrew's Gardens.

8. Cervia Heritage Considerations

Cervia is a 105 feet (32 metre) long ocean-going steam tug, with a gross registered weight of 233 tons, equipped with a (non-operational) 900HP triple-expansion steam engine. She was constructed by Alexandra Hall & Company at Aberdeen for the Ministry of War (Transport) during the Second World War to replenish war losses, to the tried-and-tested 1923 Foremost class design, to avoid unnecessary design development delays. In common with all vessels ordered by the British government during the war, she was given the prefix “Empire” and launched as the Empire Raymond. However, by the time the vessel was launched in January 1946, the war was over.

After being employed in immediate post-war operations, the tug was sold to William Watkins Ltd in December 1946, who renamed her Cervia for operations on the River Thames and further afield. Between 1947 and 1971, she was primarily based at Gravesend and crewed by people from the Gravesend area, and was a common sight off Gravesend. She could frequently be seen berthed on mooring buoys just offshore from St Andrews Gardens. In October 1954, the vessel capsized and sank in a towing accident at Tilbury, with the loss of life of five of her Gravesend crew, including the captain. Cervia was one of the last steam-driven tugs employed on the River Thames, and has strong links to Gravesend. Cervia Way is named after her.

In addition to being designated number 5 on the National Historic Ships Register, Cervia is also part of the National Historic Fleet, a subgroup of the Register, consisting of just 200 vessels that are distinguished by being of pre-eminent national or regional significance, and meriting a higher priority for long term conservation. She is believed to be the last surviving “Empire” vessel in the UK.

The proposal is to moor Cervia alongside St Andrews Quay, where the vessel will be opened to the public and operated as a static charitable heritage museum asset. Other than the installation of uprated cast-iron mooring pillars and a compact electricity and water services pillar, there will be no works or alterations to St Andrews Gardens, nor any direct impact to any of the heritage buildings in the area.

The presence of Cervia will however introduce changes to the visual outlook at St Andrews Gardens, and the impact of this is considered below.

9. Visual Impact Considerations

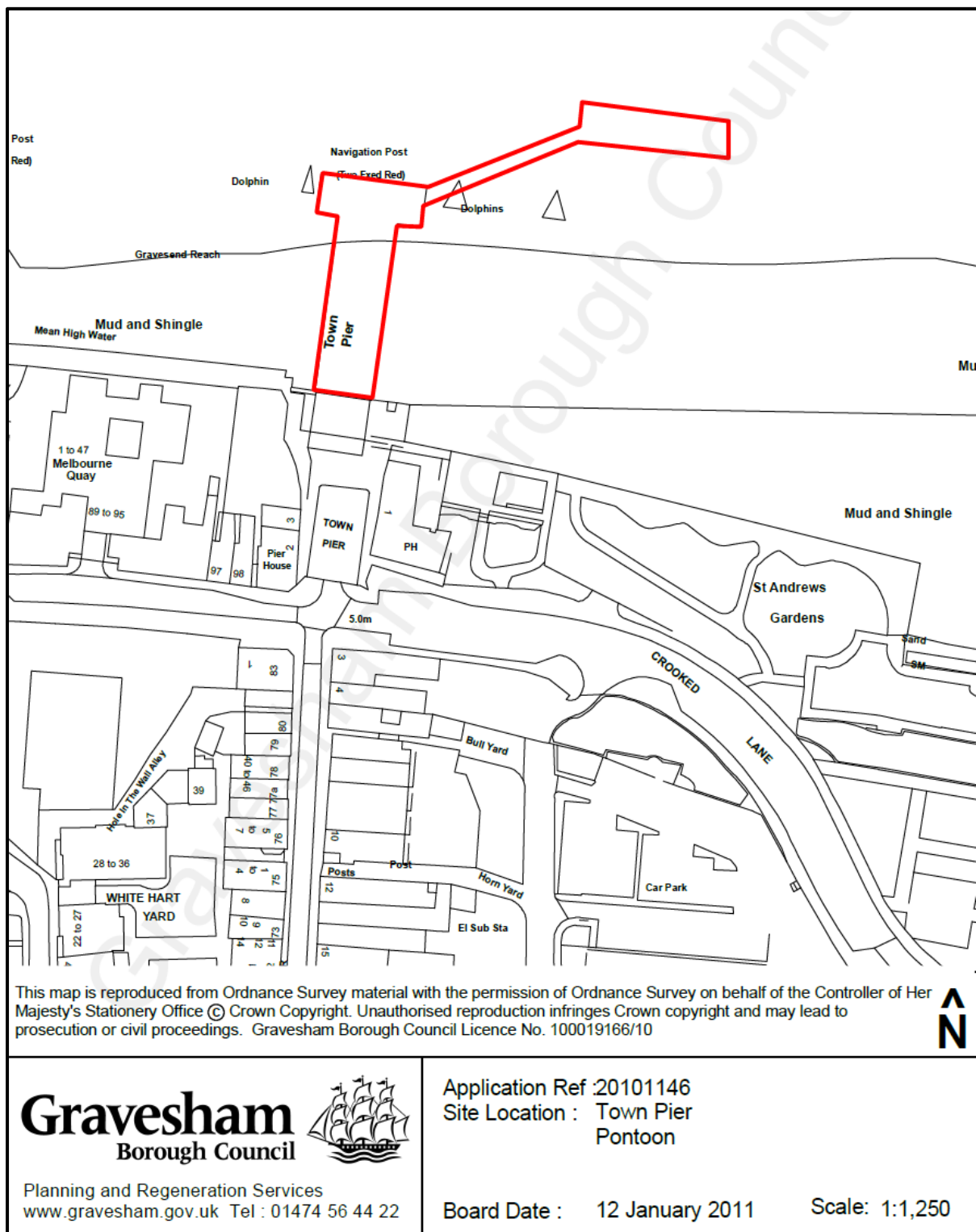
Between approximately 1960 and 2010, St Andrews Gardens enjoyed open views of the river, including the Town Pier, across to Tilbury, and downriver towards the estuary.

In 2010, permission was given to planning application 20101146 for the construction of a pontoon accessed via The Town Pier for use by ferry services, pleasure services and visiting craft. Although this is quite a low structure, it does obstruct the views across the river from St Andrews Gardens, and it does not appear as though a visual impact assessment was carried out.

It is noted that the proprietor of the Three Daws PH felt that due care had not been taken in consideration of the setting and character of the older listed building omitted from the planning discussion and objected to the loss of view of the river.

Please see Figure 1 below

Figure 1: Town Pier Pontoon.



In 2011, Gravesham Borough Council made the formal decision to install mooring facilities at St Andrews Gardens and to enter into commercial arrangements to manage the moorings, henceforth to be known as St Andrews Quay. This would introduce vessels to the location.

In 2017, Gravesham Borough Council facilitated the mooring of the former Trinity House lightship LV21 centrally at St Andrew's Quay. In order to facilitate this, upgraded mooring

pillars were installed, along with an electricity and water supply pillar, and a metal stepped platform for access to LV21's gangway. It does not appear that planning permission was required, nor that any visual impact assessment was carried out. It is not known whether any public consultation was carried out, however it is known that there has been criticism from some members of the public regarding the siting of the vessel at the quayside. Some members of the public felt (and still feel) that it is intrusive and dominating, that it seriously obstructs the views of the river, and that a former lightship has no connection to Gravesend's maritime heritage. A Google aerial view is shown in Figure 2, which also shows the pontoon.

Figure 2: LV21 As Existing.



There is little doubt that the lightship is quite dominating, and that it does obstruct the view. All views from the central part of the paved area are blocked. The Town Pier is only visible from the western part of the paved area, and views downriver are only available from the eastern part of the paved area. Balanced against this is the undoubted value of the vessel as an arts, culture, education, and heritage venue.

However, it is important to note that this application and heritage statement is not concerned with the introduction of LV21 to St Andrews Quay, nor the visual impact of this vessel. That is a separate planning matter for others to consider.

This application and heritage statement is purely concerned with mooring the steam tug Cervia at St Andrews Quay, a significantly smaller vessel that has strong links to Gravesend. We are not introducing LV21 to the area, nor are we making any change of use to St Andrews Quay. Any opinions or decision taken regarding the visual impact of having LV21 at St Andrews Quay must not be allowed to influence the decision on whether Cervia should be permitted at St Andrews Quay, and vice versa.

Nevertheless, the proposal to locate Cervia at St Andrews Quay will require the *repositioning* of LV21, either by moving the vessel approximately 18 metres to the west (ie towards the Three Daws and Town Pier), or by moving the vessel approximately 15 metres to the east (towards Bawley Bay and St Andrew's Arts Centre). In assessing the visual impact of this, this needs to be considered solely in relation to the status quo situation, ie with LV21 moored centrally at St Andrews Quay.

9.1 Option One: Cervia at western side of St Andrews Quay

Figure 3: Cervia at western side of St Andrews Quay



In this option, Cervia would be berthed at the western side of St Andrews Quay (ie towards the Three Daws and Town Pier). LV21 would need to be repositioned approximately 15 metres to the east (towards Bawley Bay and St Andrew's Arts Centre). The visual impact of LV21 is not increased or decreased, it is merely moved to the east.

It can be seen that Cervia will affect views from St Andrews Gardens towards the Town Pier, but not significantly. The low profile of the deck and gunnels, together with its relatively compact superstructure, will mean that a person standing on the central and western half of the paved area will still have views of the pier. In fact, when compared to the status quo, views from the central part of the paved area looking across the river and towards the pier will actually be improved.

9.2 Option Two: Cervia at eastern side of St Andrews Quay

Figure 4: Cervia at eastern side of St Andrews Quay



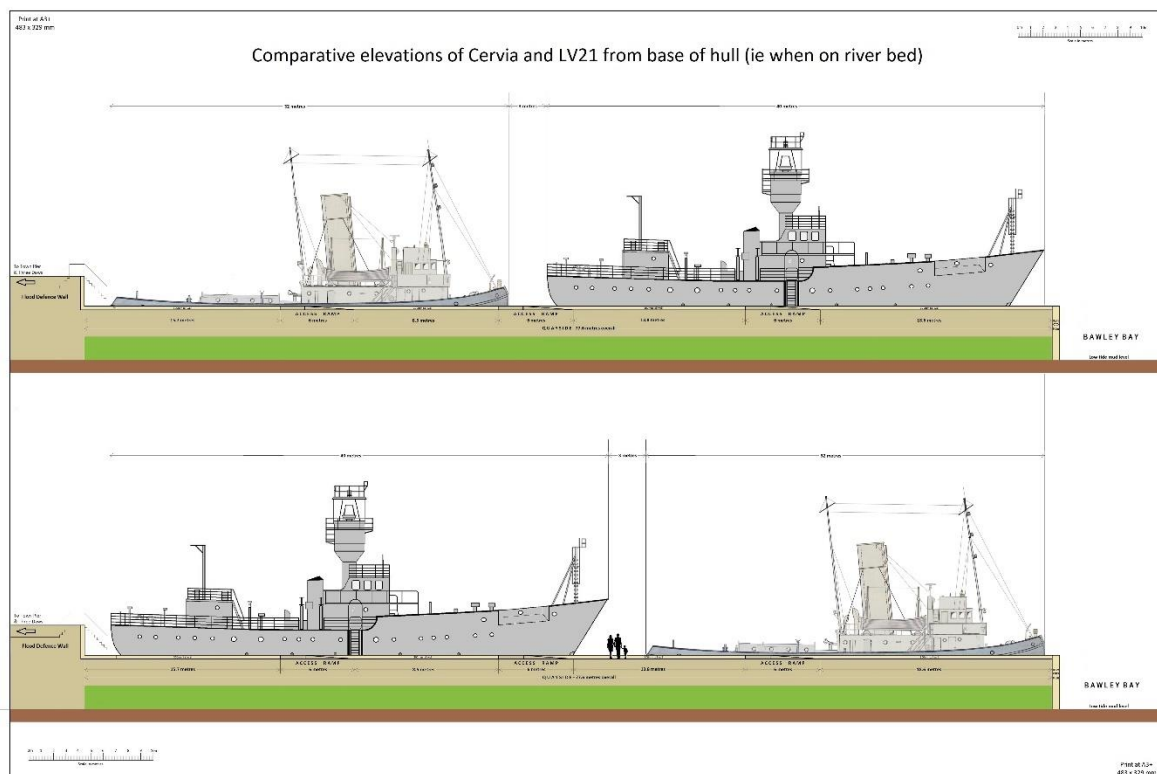
In this option, Cervia would be berthed at the eastern side of St Andrews Quay (ie towards Bawley Bay and St Andrew's Arts Centre). LV21 would be repositioned approximately 18 metres to the west (towards the Three Daws and Town Pier). Again, the visual impact of LV21 is not increased or decreased, it is merely moved to the west.

It can be seen that Cervia will affect views from St Andrews Gardens looking downriver, but not significantly. The low profile of the deck and gunnels, together with its relatively compact superstructure, will mean that a person standing on the central and eastern part of the paved area will have views downriver. In fact, when compared to the status quo, views from the central part of the paved area looking across the river and downriver will actually be improved.

9.3 Comparative Elevations

In assessing the visual impact that Cervia may have, it is useful to consider the relative differences between LV21 and Cervia in terms of bulk and scale. Cervia is 32 metres long, whereas LV21 is approximately 40 metres in length, a full 25% longer. In addition, whilst both vessels have a similar draft, the hull of LV21 is significantly higher than Cervia, ranging from between 6.5 metres and 8.5 metres from keel to gunnels, compared to Cervia's 4.5 metres to 5.5 metres. This means that even under normal conditions when the vessels are resting on the river bed, the gunnels of LV21 are still 2.5 metres to 4.5 metres above the quay, whereas Cervia's gunnels will be just 0.5 metres to 1.5 metres above the quay, thereby causing less obstruction to views. In most circumstances, people will be able to have a clear view across the decks of Cervia. This is illustrated in Figure 5 below.

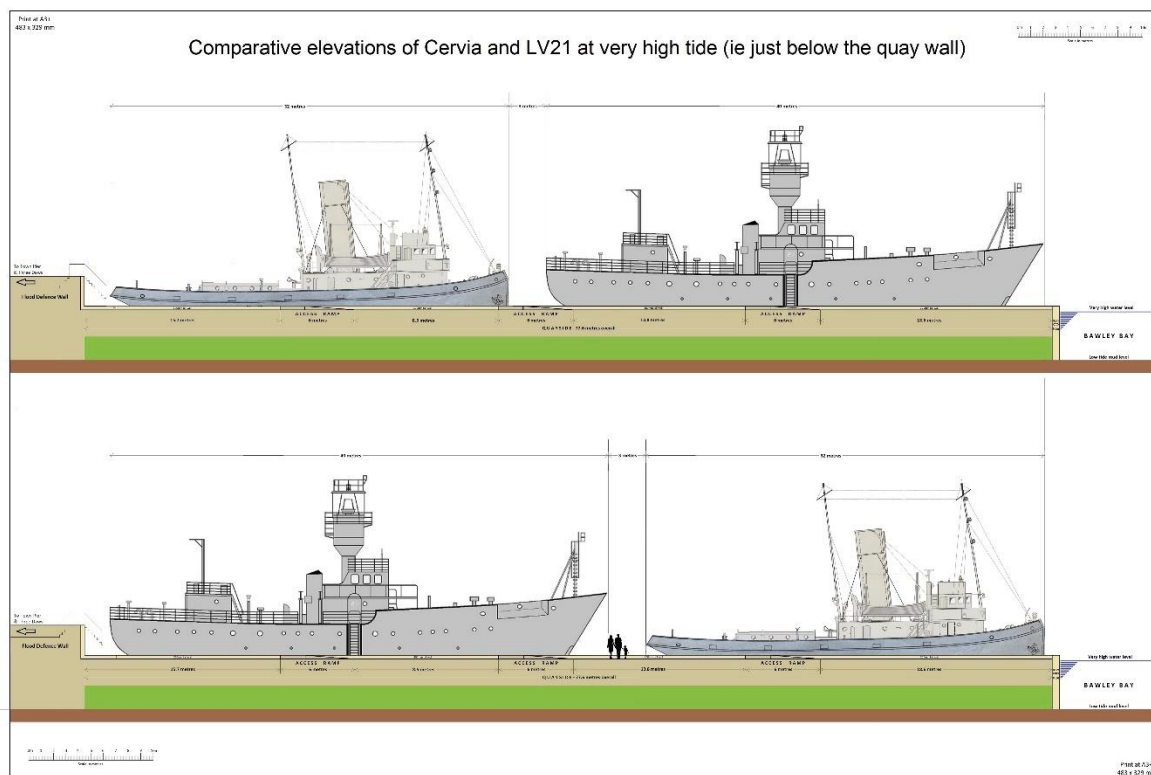
Figure 5. Comparative elevations at low tide (normal conditions).



The vessels will only float above the river bed when the tide is around 6 metres or more. This occurs on just a few occasions each month, and then only for a maximum of two hours. For completeness, the elevation drawings in Figure 6 below provide an illustration of how the vessels might appear on these infrequent occasions. In this example, the tide is very high,

just below the level of the quay. Even in these exceptional circumstances, it can be seen that people standing alongside the quay will still be able see across the decks of Cervia.

Figure 6. Comparative elevations at very high tide (exceptional conditions).



9.4 Visual Impact Appraisal Summary

In either option, views from elevated positions such as Crooked Lane and Queen Street will not be significantly impacted by Cervia, due to her low decks and relatively compact superstructure. The nearest properties are in excess of 40 metres away, and there will be no impact on daylight, sunlight, or overlooking. As the vessel will be to the north of St Andrews Gardens, there will be no impact on daylight or sunlight to the gardens or paved walkway.

In any event, we consider that the introduction of Cervia does not detract from the heritage setting or the character of the area, rather she enhances it. Cervia herself forms an integral part of Gravesend's rich maritime heritage, and harks back to a time when Cervia and many other similar steam tugs formed the backdrop of any views of the riverside at Gravesend.

The principal heritage assets, such as the Town Pier, Three Daws, St Andrews Mission, and Bawley Bay have strong links to the river, and a strong affinity to the tugs that frequented the river and to the people who crewed and serviced them. Cervia itself is a Gravesend heritage asset, and it is entirely fitting that Cervia should be prominently placed on the river, close to where she spent 25 years of her working life.

This accords with Gravesham's Local Plan Policy CS20 which seeks "to enhance the significance of the Borough's heritage assets, their setting where it contributes to the significance of the asset and their interpretation and enjoyment, especially where these contribute to the distinct identity of the Borough".

It also supports Saved Policy TC3 by making a positive contribution to the High Street & Queens Street conservation area and enhances the character of the conservation area.

10. Ecology, Biodiversity, and Air Quality Considerations

Cervia will be manoeuvred into position on a 'spring' tide, likely to be 6.5m or higher, and moored alongside St Andrews Quay. The vessel will then gradually settle onto the silt/shingle as the tide recedes.

There will be no intrusive work on the intertidal river bed, and it is highly improbable that there will be any adverse impact whatsoever on marine ecology or biodiversity, which is likely to migrate to the side of the vessel as it settles. The vessel will exert less pressure on the river bed than that of an average adult male standing on the river bed. It is expected that the tidal action will form a 'nest' for the vessel over a period of time.

No construction work will be carried out in St Andrews Gardens other than the installation of water and electricity services, and the installation of upgraded cast-iron mooring pillars on the quay wall. There will be no impact on terrestrial flora or fauna.

It is important to note that the boiler and steam engine of the vessel are non-operational and there will be no adverse impact on air quality. External lighting will be limited to discreet and inobtrusive bulkhead lighting for security purposes.

The proposed operation does not fall within Schedule 1 or Schedule 2 of The Town and Country Planning (Environmental Impact Assessment) Regulations 2017, and it would therefore be unreasonable and disproportionate to require any further ecological biodiversity assessment or mitigation in relation to this minor proposed operation.

11. Operational Use

It is intended that Cervia will be moored at St Andrews Quay and opened to the public as a static museum vessel under Use Class F1, illustrating and reinforcing Gravesham's rich maritime heritage relating to ship towage. The vessel will also be a fitting memorial to the five local crewmen who perished when Cervia capsized and sank off Tilbury in 1954.

It is expected to attract visitors who are interested in heritage vessels, and those who wish to learn more about Gravesham and its connections to the Thames.

This accords with Gravesham's Local Plan Policy CS09 which seeks to maximise opportunities for expansion in culture and tourism activity derived from Gravesham's rich and diverse heritage, including the appeal of Gravesend as a heritage riverside town, and to support the provision of new cultural and tourist facilities appropriate to their location and accessibility.

Policy CS05 also seeks to enable the provision of new and enhanced facilities to serve the needs of the Borough's residents and visitors and to maximise opportunities from an expanding visitor economy.

We believe that by bringing Cervia to St Andrews Quay and opening the vessel to the public as a maritime heritage museum exhibit, we will be supporting Gravesham's Local Plan as well as the Council's Tourism & Heritage Strategy.

Visitors will be guided around the vessel by volunteers, and volunteers will also maintain and conserve the vessel, providing work experience opportunities, thereby supporting section 5.1.4 of the Local Plan in which the Council's aims to facilitate the provision of education and skills training to enable local people to prosper by taking advantage of the employment opportunities that arise.

12. Transport Statement

Once established at St Andrews Quay, it is envisaged that the vessel will be opened to the public during local festivals and regattas, and progressively up to 6 days a week between April and September, between the hours of 10.00 and 17.00. This will depend on having sufficient visitor numbers.

The NPPF states that developments which will generate significant amounts of movements should be required to provide a Travel Plan, and the application should be supported by a transport statement or transport assessment so that the likely impacts of the proposal can be assessed. It is not considered that this proposal will generate significant volumes of visitors.

Table 1 of Kent County Council Supplementary Planning Guidance SPG 4 gives a floor area threshold of 2,500m² for the requirement for a transport assessment or travel plan for Use Class F1 (formerly D1). The maximum floor area of Cervia that will be accessible to the public is around one tenth of this threshold. A transport assessment and/or travel plan is therefore not necessary. Nevertheless, the following information is included in order to provide some background to the likely volume of journeys that may be generated.

It is envisaged that there will be up to 1,000 visitors in the first year, increasing to 2,000 visitors a year in subsequent years. These numbers are not significant, amounting to an average of around 6 to 12 visitors a day, but higher at weekends and during local festivals.

St Andrews Quay is accessed on foot, and the existing paved area alongside the quay forms part of the Saxon Shore Way, incorporating three existing vessel access points. Each access point is approached by a concrete ramp and platform, level with the top of the quayside. These do not obstruct or interfere with the Saxon Shore Way, nor would any additional or latitudinal extension to one or more of the access points.

The quayside is within 30 metres of National Cycling Route 177 but not on it. It is within 35 metres of the A226 Crooked Lane. Two minor injury accidents have been recorded on or near the zebra crossing near the Queen Street/Bank Street/Crooked Lane junction within the past five years.

Local transport links and other places of interest are within easy walking distance, as shown below.

	Walking Distance	Walking Time
LV21 arts, culture, education, and heritage venue	adjacent	1 minute
St Andrews Arts Centre	50m	1 minute
Crooked Lane (nearest bus stop)	50m	1 minute
Town Pier (ferry terminal)	100m	1 minute
Henry VIII Blockhouse	175m	2 minutes
West Street car park	200m	3 minutes
Pocahontas Statue	300m	4 minutes
Prom/Fort Gardens	500m	6 minutes
Barrack Row Bus Hub	650m	8 minutes
Gravesend Station	650m	8 minutes
Parrock Street car park	650m	8 minutes

There are no parking provisions on the site, and Cervia will not be directly accessible by car. There are however limited short-term parking bays directly opposite St Andrews Gardens in Crooked Lane, including two disabled bays, and limited parking in Royal Pier Road. The nearest car park is in West Street, 200 metres away.

The nearest bus stop is just 35 metres away, and it is a short walk to the town transport hub and the railway station. From here, there are frequent bus services to all parts of the Borough, and there are good rail services to Gravesend from Dartford and the Medway Towns, and High Speed services from London.

It should be noted that St Andrews Quay is adjacent to the Town Pier and ferry terminal. From 2025, Thames Clippers are planning to operate fast river services between the Town Pier and London. It is an important part of our business plan that we intend to attract visitors from London to visit Cervia, since Thames Clipper services from London during the morning and back to London during the afternoon are likely to be underutilised. In addition, we intend to advertise in the London Cruise Terminal at Tilbury to attract cruise liner passengers to visit Cervia. We intend to make good use of river connections to Gravesend, to reduce reliance on cars.

The former Trinity House lightship LV21 attracts a modest number of visitors, and it is quite likely that visitors to LV21 will also be interested in visiting Cervia. A proportion of visitors will be passing visitors, such as local shoppers or people attracted to local festivals. These will not have any impact on vehicle journeys, since they would have made the journey for other reasons, whether Cervia is there or not.

In view of the modest number of expected visitors to Cervia, and the fact that most visitors will either be passing, visiting other venues, or travelling by public transport or river services, it is expected that the number of additional car journeys generated will be insignificant. It would therefore be entirely disproportionate and unreasonable to require a transport assessment or travel plan to be commissioned.

13. Conclusions

We consider that we have used the most appropriate application procedure under Article 39 of the Town and Country Planning (Development Management Procedure) (England) 2015, and that we have identified the location on the river where the operation under Use Class F1 will take place.

There will be no change of use to St Andrews Gardens itself. That decision was taken by Gravesham Borough Council in January 2011 when mooring facilities were approved and St Andrews Quay was designated. Any potential anomaly regarding that change of use would be subject to the 10 year rule and is for Gravesham Borough Council to address.

We have taken account of the NPPF and, importantly, the relevant parts of Gravesham's Local Plan Core Strategy. We have considered the impact of the proposal with respect to its heritage setting and, importantly, the impact that Cervia may have to the views in this area.

We have considered the ecological biodiversity of the site and the potential impact of the proposed operations, and concluded that there will be no adverse impact whatsoever. We have considered the potential impact on additional car journeys, and have demonstrated that this would be insignificant.

We believe that this is an exceptional opportunity to restore an important part of Gravesham's rich maritime heritage back to its rightful place, to reinforce Gravesend's historic link to ship towage, by complementing and enhancing the significance of designated and non-designated assets in the immediate riverside area. It will provide a fitting memorial to the five Gravesend crew members who lost their lives on this vessel, and to the generations of local people who dedicated their lives to working on the river.

The mooring facility was established by Gravesham Borough Council in 2011. The location is favoured by senior Gravesham Borough Council officers, and this proposal will support Gravesham's Tourism and Heritage Strategy, and help to reduce the disconnection between the town centre and St Andrews Gardens and the riverside.

We can see no valid reason why this application should be refused, it accords with policies in Gravesham's Local Plan Core Strategy, and it is therefore our view that this application should be supported in accordance with the NPPF's presumption in favour of sustainable development.

Although not strictly a planning consideration, it is important to note that refusal of this application will not just mean that Cervia will not return to Gravesend, it is likely to result in the loss of this important historic vessel to the nation.

If you require further information or clarification, please do not hesitate to contact the applicant.