

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

Our ref: KT/2023/130754/01-L01
Your ref: 20230515
Date: 28 July 2023

Dear Kelly

Application for a Lawful Development Certificate for works to facilitate 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.

St Andrew's Gardens, Royal Pier Road, Gravesend, Kent

Thank you for consulting us on the above application. **We do not have objections to the above application, subject to the following comments.**

Biodiversity

We do not have any objections provided more information for the mitigation of habitat loss is provided.

Whilst we are supportive in principle of encouraging greater public engagement with the river, we are aware that the vessel will ground out at low tide upon the intertidal mudflat. This will potentially precluding viable habitat for wading birds.

Please could confirm how the applicant seeks to mitigate for this potential loss through either off-site riverine enhancement or by design?

Barge grids have been used elsewhere on the Thames to elevate Dutch barges from grounding out over intertidal mud. However, we are aware the hull design of this vessel may not allow a similar system.

Flood Risk

We would not object to the principle of the mooring changes and the placement of the historic steam tug. However, it should be noted that any works to the formal tidal flood defence would require a Flood Risk Activities Permit (FRAP) from the Environment Agency.

The tidal Thames frontage features a flood defence line which should provide a 1 in 1000 year level of protection to much of the neighbouring land. At St Andrew's Gardens, much of the flood defence line is formed by high ground and a low wall which both run inland of the river wall, where the moorings are located.

As much of the river wall is not a formal tidal flood defence, we would not object to the change in moorings along this length. However, directly west of St Andrew's Garden the formal tidal flood defence is formed by the river wall which features a higher crest level where it fronts the pub garden.

From the submitted drawings, it would appear that the proposed moorings do not interact with the tidal flood defence. Were any of the proposed construction activities to impact the tidal flood defence, the applicant must obtain a FRAP from the Environment Agency.

Informative Flood Risk Activity Permit

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.

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.

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

Yours sincerely

Ms Laura Edwards

Planning Advisor

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