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Port of London Authority Response (DC 357) Plan ref 20230515 St Andrews Gardens, Royal Pier Road, Gravesend, Kent

Dear Kelly

Thank you for consulting the Port of London Authority (PLA) on the above mentioned application for a Lawful Development Certificate for the mooring of the historic steam tug Cervia at St Andrews Quay, Royal Pier Road. We have now had the opportunity to review the submitted documents and have a number of concerns. For information, the PLA has previously provided, pre-application advice on this proposal and informed the applicant that it was likely that planning permission would be required for this proposal, which remains the position in terms of our overall conclusion.

A lawful development certificate can be granted for existing or proposed use or some operational development that is considered lawful for planning purposes ([section 191-192 of the Town and Country Planning Act 1990](#)). The permanent mooring of the Cervia and use as a heritage museum under Use Class F1, at St Andrew's Gardens would be considered a material change of use of the site and therefore is not considered to meet the appropriate tests for lawful development. The existing moorings are for temporary use and therefore the proposal to moor on a permanent basis and use as a heritage museum is development and outside the scope of Permitted Development. In addition to planning permission the proposal is also likely to need a Flood Risk Activity Permit from the Environment Agency.

In preparing a planning application for this proposal we would like to advise on a number of issues that should be addressed. Further detail should be provided on the mooring bollards to ensure that they are fit for purpose and that the vessel is properly secured in the interests of safety (chains, wires and welding securings may need to be used). [The Use of the Tidal Thames](#) provides further guidance, including consideration on the need to provide any wash mitigation measures within the planning application to take account of any effects of wash and draw off experienced from passing vessels. As this is a drying berth the vessel must also be moored to account for the rise and fall of the tide and any forthcoming application should be supported by more detailed information on this matter.

As part of any forthcoming application information will be required on the provision of any appropriate riparian life saving equipment (such as life buoys) in line with the PLA's 'A Safer Riverside' guidance for development on and alongside the tidal Thames.

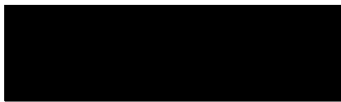
(<https://www.pla.co.uk/assets/asaferriversidev15.pdf>).

It will need to be demonstrated within a forthcoming planning application that the river wall is capable of taking the load associated with having both the Cervia and LV21. If LV21 needs to be repositioned to accommodate the mooring of Cervia, consent will be required from the LV21 Licensee any associated River Works Licence (RWL) for this vessel will require amendment. To confirm a RWL will also be required for the mooring of the Cervia and the PLA's Statutory Consents and Compliance team should be contact with regard to this at lic.app@pla.co.uk .

Whilst we have provided details of what is required to support an application this should not be taken as formal pre application advice or that a planning application or forthcoming RWL would be successful, as these will need to be considered on their own merits. The PLA therefore requests to be reconsulted on submission of a planning application for this proposal.

I hope these comments are of assistance.

Yours sincerely



Maeliosa Hardy

Planning Consultant