

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

Our ref: KT/2021/128685/02-L01
Your ref: 20210757
Date: 25 October 2022

Dear Sir/Madam

Redevelopment Of The Site And Conversion Of The Existing Building To Provide 27 Residential Units (6 X 1 Bed, 12 X 2 Bed And 9 X 3 Bed) With Associated Landscaping, Parking And Vehicular Access.

Custom House, The Terrace, Gravesend, Kent DA12 2BW

Thank you for consulting us on the above application. **We object to the proposal for the reasons set out below.**

Flood Risk

We object to the proposed development as the submitted Flood Risk Assessment (FRA) and supporting documents haven't been updated to respond to comments from the Environment Agency. Therefore, the proposal does not meet the requirements of the National Planning Policy Framework or the Planning Practice Guidance.

To summarise our requirements, the applicant should:

- Explain why the entire length of the applicant's tidal flood defence will not be raised to 8.00m Above Ordnance Datum - the level required for a residential development to meet the requirements of the Thames Estuary 2100 Plan (TE2100).
- Carry out sufficient testing of the tidal flood defence to provide a representative sample of the asset's condition to support any proposal which includes retaining the existing flood defence in part or full.
- Detail how the proposed concrete coating could provide a 100 year design life.
- Leave a 1.2 metre wide exclusion zone as an absolute minimum to the tidal flood defence to allow space for inspection. Additionally, retain additional space for minor maintenance and major renewal of the flood defence asset. The applicant should detail what space would be required for the agreed flood defence.

A Flood Risk Activity Permit must be granted, by the Environment Agency, before any works can take place within 16 metres of the tidal flood defence. We would not grant a permit for the proposed development in its current form.

Overcoming Our Objection

The applicant needs to provide information to address the above points to overcome our objection.

Fisheries, Biodiversity and Geomorphology

We object because the updated information submitted **does not contain a Preliminary Ecological Appraisal**. The environmental desk study does not adequately assess the current habitats; potential for protected or endangered species/vegetation within the site; carry out a comprehensive desk study to determine protected or designated sites and/or receptors or use a suitably qualified ecologist to inform the assessment and associated recommendations for enhancement.

Reason

A preliminary ecological appraisal (PEA) is essential to inform both the applicant and the statutory consultees of the current ecological status of the site. The PEA also ensures that there is an awareness of the potential for ecological enhancement fulfilling Biodiversity net gain as set out in the Defra 3.1 metric, the National Planning Policy Framework and Local Plan policy to enhance and conserve the biodiversity value of the local environment.

The National Planning Policy Framework Chapter 15 Conserving and enhancing the natural environment paragraphs 174, 175, 179, 180, 181 and 182 are relevant.

Overcoming Our Objection

The applicant needs to provide a Preliminary Ecological Appraisal conducted by a suitably qualified ecologist and demonstrate that significant aquatic biodiversity enhancement has been addressed. This could include (but not limited to) enhancement of the pier structures to include intertidal planters/vertical beaches. The removal of one or both of the piers (if defunct) to reinstate the foreshore to support the proposed planting within the splash zone. Please refer to www.estuaryedges.co.uk for further guidance.

Please note that we have further comments to make should the above objections be overcome.

Advice to LPA If you are minded to approve the application contrary to this advice, we request that you contact us to allow further discussion and/or representations from us in line with the Town and Country Planning (Consultation) (England) Direction 2009. In particular we would impose planning conditions for flood and coastal risk management, for the protection of groundwater and to deal with land affected by contamination.

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

Yours faithfully

Ms Laura Edwards

Planning Advisor

Direct dial 02084749079

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Environment Agency

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