

Delegated Report

Variation of Condition Application

Planning Application No: 20250381

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

Description: Application for variation of condition 2 attached to planning permission reference number 20221294 for 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; to allow landscaping changes and amendment to the plans.

Applicant: Mr Michael Atkins

Site Visit Date: Desktop

Submitted Documents/Plans

- Cover Letter;
- Application form;
- Drawing no. PCC-BA-10-ZZ-DP-A-01 Rev. P3 – Proposed Site Plan;
- Drawing no. LNK-BA-12-ZZ-DP-A-0 Rev. P3 - Existing Link Building Levels 1&2;
- Drawing no. PCC-BA-12-L1-DP-A-0 Rev. P2 – Existing Level 1;
- Drawing no. PCC-BA-12-L2-DP-A-0 Rev. P2 – Existing Level 2;
- Drawing no. PCC-BA-12-L3-DP-A-0 Rev. P2 – Existing Level 3;
- Drawing no. PCC-BA-12-L4-DP-A-0 Rev. P2 – Existing level 4;
- Drawing no. PCC-BA-12-ES-DP-A-0 Rev. P2 – Existing South Elevation;
- Drawing no. LNK-BA-20-ZZ-DP-A-0 Rev. P3 – Proposed Link Building Plans Levels 1 & 2;
- Drawing no. PCC-BA-20-L0-DP-A-0 Rev. P3 – Proposed Lower Ground Floor;
- Drawing no. PCC-BA-20-L1-DP-A-0 Rev. P3 – Proposed Level 1;
- Drawing no. PCC-BA-20-L2-DP-A-0 Rev. P3 – Proposed Level 2;
- Drawing no. PCC-BA-20-L3-DP-A-0 Rev. P3 – Proposed Level 3;
- Drawing no. PCC-BA-20-L4-DP-A-0 Rev. P3 – Proposed Level 4;
- Drawing no. PCC-BA-20-ES-DP-A-0 Rev. P2 – Proposed South Elevation;
- Drawing no. PCC-BA-20-R1-DP-A-0 Rev. P3 – Proposed Roof Plan;
- Drawing no. PCC-BA-20-S1-DP-A-0 Rev. P2 – Proposed Section AA;
- Drawing no. PCC-BA-90-ZZ-DP-A-0 Rev. P3 – Proposed Surface Types;
- Drawing no. PCC-HDR-XX-ZZ-DR-S-02111 Rev. P2 – External Works Layout Foundation General Arrangement;
- Drawing no. PCC-HDR-XX-ZZ-DR-S-02114 Rev. P1 – External Works Layout Sections & Details;
- Drawing no. SHA 1900 TSP -Tree Survey Plan;
- List of Documents and Plans;
- Flood Risk Assessment, Dated 7 August 2005, Issue 4, Reference 10342643;
- Planning Statement April 2025;
- Planning Design and Access Statement 2025;

- Port of London Port Control Centre Landscaping;
- Heritage Statement Addendum April 2025;
- Transport Statement Addendum;
- Tree Survey Sheets.

Relevant Planning History

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

Reference	Description	Decision	Decision Date
20250770	Application for the approval of condition 11 attached to planning permission reference number 20221294 relating to full details of its (refuse store) appearance and size.	Approval of Details	24.09.2025
20250435	Application for the approval of condition 12 and 13 attached to planning permission reference number 20221294 relating to a condition assessment of the site's tidal Thames flood defence and 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.	Approval of details	27.10.2025
20231211	Application for the approval of condition 3 attached to planning permission reference number 20221294 relating to full Preliminary Ecological Assessment and enhancement opportunities.	Approval of details	18.01.2024
20230914	Application for the approval of condition 6 attached to planning permission reference number 20221294 relating to full details of the size and appearance of the communications tower.	Approval of details	07.11.2023
20221295	Application for Listed Building Consent for the 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	Permitted	20.04.2023
20221294	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.	Permitted	20.04.2023

Development Plan

Gravesham Local Plan Core Strategy (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 34 of the NPPF (2024) 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 (2024), the Council will also seek to replace these.

Other material considerations

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

Section 72(1) of the Planning (Listed Buildings and Conservation Areas) Act 1990 as amended which states that, with respect to buildings or other land in a conservation area, special attention shall be paid to the desirability of preserving or enhancing the character or appearance of that area

National Planning Policy Framework (2024)

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

Supplementary Planning Guidance

- Gravesend Riverside Conservation Area Character Appraisal (2009);
- Management Plan Gravesend Town Centre Conservation Areas (2009).
- SPG 2 – Residential layout guidelines including Housing Standards Policy Statement October 2015 Adopted 1996 – amended June 2020
- SPG 4 – KCC Parking Standards (2006)
- Design for Gravesham – Design Code (2024)

Consultations, Publicity and Representations

Consultees

Environment Agency – 17/10/2025 (final comment)

We have **no objection** to the variation of condition 2.

The above FRA has now been amended to not include inconsistencies in terms of which parts of the flood defence are to be removed as in Figure 7. As such we are able to remove our previous objection.

Environment Agency – 01/08/2025 (second comment)

We **object** to the proposed variation of condition 2 as the applicant has not adequately demonstrated that the proposed development would be safe for its lifetime without increasing flood risk elsewhere, in line with paragraphs 178 and 181 of the National Planning Policy Framework.

Please refer to the following sections for our full response:

- Section 1: Reasons for, and how to overcome, our objection(s)
- Section 2: Other technical comments
- Section 3: Notes to the Local Planning Authority / Applicant

Please note that our comments are based on the details available to us at the time of writing. Please be aware that we wish to be re-consulted on this planning application once the required information has been submitted. Please also note that our subsequent advice may concern other important environmental issues.

Section 1: Reasons for, and how to overcome, our objection(s)

Reasons

The submitted drawing 'Proposed external works layout foundation general arrangement' shows a small section of the defence 'bull nose' towards the front of the site to be removed. We do not believe that removal of this section of flood defence will increase flooding to the surrounding area, and therefore we do not object in principle to the removal of this section of flood defence.

However, Figure 7: Proposed Landscaping/ SuDS Features in the submitted FRA shows a larger portion of the flood defence to be demolished and not just the 'bull nose' towards the front of the site, which would not be acceptable. The applicant needs to confirm that the only section of the flood defence to be removed will be the 'bull nose' of the defence. It may be the case that this specific figure has not been updated to reflect the other details submitted.

Overcoming our objection

The applicant should confirm, and ensure all submitted documents are consistent, that only the 'bull nose' end of the flood defence wall is proposed to be removed.

Section 2: Other technical comments

It is shown within the submitted 'Proposed external works layout sections & details' that the flood defence has a crest level of 6.800mAOD.

'External Works Section H' shows that the proposed external structure beam will be at a height of 7.493mAOD, which will provide sufficient space for raising the defence crest level to the TE2100 Plan for 2040 with the flood defence raised to no less than 6.900mAOD.

'External Works Section G' shows that the proposed external structure beam will be at a height of 7.071mAOD. Even though the space is limited between the crest level of the defence and the underside of the structure beam, there is, even though quite limited, space available to also raise the section of defence within this area to the TE2100 Plan for 2040 to 6.900mAOD during construction.

Environment Agency – 21/05/2025 (first comment)

We **object** to the proposed variation of condition 2 as the applicant has not adequately demonstrated that the proposed development would be made safe for its lifetime without increasing flood risk elsewhere, in line with paragraphs 178 and 181 of the National Planning Policy Framework.

Please refer to the following sections for our full response:

- Section 1: Reasons for, and how to overcome, our objection(s)
- Section 2: Notes to the Local Planning Authority / Applicant

Please note that our comments are based on the details available to us at the time of writing. Please be aware that we wish to be re-consulted on this planning application once the required information has been submitted. Please also note that our subsequent advice may concern other important environmental issues.

If you are minded to approve the application contrary to our objection, please contact us to explain why material considerations outweigh our objection. This will allow us to make further representations.

Section 1: Reasons for, and how to overcome, our objection(s)

Reasons

We object to the proposed variation of condition 2 as the proposal does not meet the requirements of the National Planning Policy Framework (NPPF).

To meet the requirements of the NPPF set out in paragraphs 178 and 181, the proposal should be made safe for its lifetime without increasing flood risk elsewhere. The site, located within Flood Zones 2 and 3, is partially protected by the tidal Thames flood defence. We have concerns relating to this existing flood defence wall.

We note from drawing ref. PCC-BA-90-ZZ-D-A-02 in the FRA Appendix A1 that the applicant proposes to remove the existing section of flood defence that wraps around the front of the building to the south. No further explanations or mitigation measures for this removal have been provided.

Additionally, the flood defence assets will require maintenance and crest level raising to maintain this standard of protection. We note that part of the defence appears to pass under London River House which may pose a significant challenge to maintaining the standard of flood protection to the site and surroundings.

It was previously agreed during consultation on the original application LPA ref. 20221294 that this can be addressed at a later stage by suitably worded planning conditions (see our letter ref. KT/2023/130393/03 dated 24 March 2023) which were then included on the decision notice (dated 20 April 2023). This approach is therefore still considered acceptable.

Overcoming our objection

We require the applicant to elaborate on and provide justification for their proposal to remove a section of the flood defence wall.

GBC Environmental Protection

There is no objection to this application. Any conditions still outstanding from 20221294 should be re-instated on any permission granted for this variation.

Historic England

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 application.

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 this application again, unless there are material changes to the proposals. However, if you would like advice from us, please contact us to explain your request.

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.

KCC Heritage

I have no comments to make on archaeology in this case and defer to your Conservation Officer in respect of built heritage matters.

Neighbouring properties

16 surrounding properties were consulted plus site and press notices – overall consultation expiry date was 20.10.2025 – 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.

Planning permission and listed building consent was granted on 20 April 2023 under application refs. 20221294 & 20221295 for '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.

This current application is for variation of condition 2 (approved drawings and plans) attached to planning

permission ref. 20221294 to allow amendments to the external landscaping. It is prudent to note that there is also a separate Listed Building Consent application for incorporate the proposed changes in the development given that amendments cannot be made to a Listed Building Consent.

On the application form it is stated that the development was started on 04/03/2024 but has not been completed.

It is prudent to note that of the conditions attached to ref. 20221294 the following have been discharged:

Condition 3 – approved under application ref. 20231211 on 18.01.2024

3. Prior to the commencement of the 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 the National Planning Policy Framework (2021) with particular reference to paragraphs 179-180.

Reason: *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 in accordance with Policy CS12 of the Gravesham Local Plan Core Strategy (2014) and section 15 of the National Planning Policy Framework (2021).*

Condition 6 – approved under application ref. 20230914 on 07.11.2023

6. Prior to the new communications tower being installed on Alexandra House full details of the size and appearance of the communications tower shall be submitted to and approved in writing by the Local Planning Authority. The development shall be carried out in accordance with the approved details. Within 15 months of the new communications tower being in operation the existing communications tower on the Port Control Centre (PCC) building shall be removed in its entirety and shall not be reinstated or relocated elsewhere in the application site at any time thereafter.

Reason: *In order to protect the visual amenities of the building and the surrounding area, the setting of the adjacent Grade II Listed Royal Terrace Pier and the character and appearance of the Riverside Conservation Area in accordance with Policies CS19 and CS20 Gravesham Local Plan Core Strategy (September 2014) and Saved Policies TC2 and TC3 of the Gravesham Local Plan First Review 1994.*

Condition 11 – approved on under application ref. 20250770 on 24.09.2025

11. Prior to the re-located refuse store first coming into use full details of its appearance and size shall be submitted to and approved in writing by the Local Planning Authority. The development shall be carried out in accordance with the approved details and shall be thereafter retained for such purposes at all times.

Reason: *In order to ensure the development is served by a suitable refuse storage area and to protect the visual amenities of the building and the surrounding area, the setting of the adjacent Grade II Listed Royal Terrace Pier and the character and appearance of the Riverside Conservation Area in accordance with Policies CS19 and CS20 Gravesham Local Plan: Core Strategy (September 2014) and Saved Policies TC2 and TC3 of the Gravesham Local Plan First Review 1994.*

Conditions 12 & 13 – approved under application ref. 20250435 on 27.10.2025

12. 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 accordance with Policy CS18 of the Gravesham Local Plan Core Strategy (2014) and section 14 of the National Planning Policy Framework (2021).

13. 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 which 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 accordance with Policy CS18 of the Gravesham Local Plan Core Strategy (2014) and section 14 of the National Planning Policy Framework (2021).*

Should permission be forthcoming these conditions would not therefore need to be applied again, although it should be noted that condition 6 (communication towers) would need to be attached again in so much as regarding the removal of the existing tower from the PCC building within 15 months of the operation of the new tower on Alexandra House.

It is only the landscaping in front of London River House, the Link building and the Port Control Centre which it is proposed to amend; the landscaping permitted in front of the grade II listed Royal Terrace Pier (including the forecourt repaving) and Alexandra House remain unchanged. In addition, it is also confirmed in the Planning Statement that there are no changes proposed to the rest of the approved scheme. Therefore, to confirm there are no changes to the following approved elements:

- Demolition of external stairwell
- Construction of a new single story roof space
- Removal and relocation of the radar mast (complete)
- Internal refurbishment
- Improvements to exterior facades
- Enhancement of existing link between the Port Control Centre and the Grade II Listed Royal Terrace Pier
- Repaving works in the forecourt area of the Grade II Listed Royal Terrace Pier.

The principle issues in the assessment of the application are as follows.

Design, Character, Appearance including Heritage

The Planning Statement submitted with the application sets out that the proposed changes are necessary for the principle reason of protecting the existing trees in Royal Pier Road which are just outside of the site. It is stated that upon further investigation post permission (ref. 20221294 & 20221295) it was discovered that the permitted scheme would cause root severance of the existing trees lining Royal Pier Road which are situated outside of the redline boundary and the PLA's ownership, which it had been stated in the previous applications would remain. It was found that the root protection zones encroach into the areas where the large planters, ramps and stairs were to be as permitted under application ref. 20221294. The design of the landscaping in front of the London River House and the Port Control Centre areas has therefore been amended to ensure that these existing trees are protected whilst also retaining the key design concepts of the development therefore, the planters, ramps and stairs have been re-located.



It is also stated that there are additional benefits from the amended external landscaping proposals. These are the retention of the existing car parking spaces in front of London River House and better integration of the access ramps.

For ease of reference the approved landscaping under application ref. 20221294 and the proposed landscaping scheme in this current application are shown below:

Approved Landscaping – under application ref. 20221294



Approved Landscaping – under application ref. 20221294 – showing the Root Protection Zones



Proposed Landscaping – in this current application ref. 20250381



The following shows the key changes – the movement of the ramped access, steps and planters:



The below shows visuals of the proposed landscaping:



Approach from the west



Approach from the south via Royal Pier Road

In the approval the ramp, planters and main steps were to be in front of London River House and the link building just behind the trees outside of the site. Due to the Root Protection Zone issues the ramp, planters and steps are now proposed further back and would be in front of the Link building and the Port Control

Centre (PCC) building. There would be a smaller ramp, area of planters and steps and therefore there would be slightly less soft landscaping overall compared to the approved scheme. It is unfortunate that there will be slightly less in the way of planters and therefore soft landscaping overall however, there are considered no issues with the ramp being moved further back and changed in angle, a slightly smaller set of steps and the amended proposal would have the benefit of ensuring that the proposed hard and soft landscaping works would not impact on the existing trees in Royal Pier just outside the site, which the approved scheme would do. The area where the ramp was proposed would just remain as part of the existing parking area outside of the Link building, and therefore it should be noted this is not additional hardstanding area. The relocated and smaller ramp would take up less space, is more streamline, would be located in a more centralised position to the actual entrance of the PLA reception and PCC building than the approved scheme and would allow for the retention of an existing, established grassed area.

Overall, the alternative scheme is considered well designed and one which would ensure the character and appearance of the Riverside Conservation Area would be preserved. As such, in respect of design, character and appearance the proposed amendments to the landscaping in the approved scheme ref. 20221294 are considered compliant with Policy CS19 (LPCS).

Neighbouring Amenity

The proposed landscaping changes in front of the London River House and the Port Control Centre in the form of amendments to the proposed ramp, planters and steps would not affect the amenity of any neighbouring properties. As such in regard to neighbouring amenity the proposal is compliant with Policy CS19 (LPCS).

Parking and Highways

The proposed landscaping changes in front of the London River House and the Port Control Centre in the form of amendments to the proposed ramp, planters and steps would have the effect of the existing parking area in front of the Link building being retained as it is (in approved application ref. 20221294 it was to be replaced by the ramp and hard landscaped area with steps and a planter). With the parking at the front to remain (five spaces) there would therefore be less of an impact than the approved application and there would be no change in parking provision.

With this amended proposal, the car parking area and vehicular access would remain as is and so it would provide accessible parking for disabled visitors who can then access and make use of the proposed re-located ramp in this application. With the existing disabled spaces in the undercroft of London River House, it is said this would be an improvement and this is agreed with. It is also said that it would allow accessible parking areas for deliveries to the PLA so that vehicles can park off of Royal Pier Road. Again, this is agreed with that it would be a positive benefit from the proposed changes to the landscaping.

As such, in respect of parking and highways the proposal is considered compliant with Policy CS11 (LPCS) and saved Policy P3 (LPFR).

Flooding

The site is located in Flood Zones 2 & 3 and a revised Flood Risk Assessment (FRA) has been submitted with the application. Originally the Environment Agency (EA) objected to the proposal in respect of flood risk as they stated that the applicant had not adequately demonstrated that the proposed development would be made safe for its lifetime without increasing flood risk elsewhere. Given some discrepancies in the FRA the EA wanted the applicant to confirm it would just be the bullnose section of the flood defence wall that would be removed and not anymore. The applicant updated the FRA to confirm it is just the bull nose section of the flood defence wall that will be removed. On this basis the EA advises that with the amended FRA which has corrected the inaccuracies on which parts of the flood defence wall are to be amended, they now have no objection to this variation of condition application. As such, 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

In the original application ref. 20221294 the Environment Agency advised that the proposal would only meet the requirements of the NPPF (then NPPF 2021, now NPPF 2024) if a condition is attached requesting a preliminary ecological appraisal and enhancement opportunities and that this was required prior to the development commencing. The applicant was asked if they agreed to this condition and they confirmed they did. Subject to this condition it was therefore considered the proposal was acceptable in respect of Policy CS12 (LPCS) and section 15 of the NPPF (then NPPF 2021, now NPPF 2024). In this case that condition (condition 3) was discharged on 18.01.2024 so would not need to be re-attached if this condition for variation of condition 2 is approved. The proposal is therefore considered acceptable in respect of ecology and biodiversity and in this respect it is compliant with Policy CS12 (LPCS) and

Archaeology

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

Any Other Material Planning Considerations

None.

Conclusion

The proposed changes in respect of the external landscaping are considered acceptable. This is in respect of design, character and appearance including heritage, neighbouring amenity, parking and highways, flooding, ecology and biodiversity and archaeology and therefore the amendments are compliant with local and national planning policy.

Recommendation

Permission

(For detailed conditions and informatives, see draft Decision). However, it is considered prudent to go through the conditions of original application ref. 20221294 here to explain what conditions will need to be attached, what will need to be amended and what will not need to be attached.

In respect of the conditions on 20221294:

Condition 1 (Time limit) – should not be attached as the development has already begun.

Condition 2 (Approved plans & documents) – as development as begun this would need to be amended to state the development as carried out shall accord with the list of approved plans and documents which would need to be amended to remove the ones which have been superseded & add the ones from this application

Condition 3 (Preliminary Ecological Appraisal) – should not be attached this condition was discharged under application ref. 20231211 on 18.01.2024.

Condition 4 (External facing materials for new story on PCC building) – would need to be attached as although an application for this condition has been submitted under application ref. 20251208 this condition has not been discharged.

Condition 5 (External facing materials for the new and retained walls on link between PCC building and Royal Terrace Pier) - would need to be attached as although an application for this condition has been

submitted under application ref. 20251208 this condition has not been discharged.

Condition 6 (Details of size and appearance of new communications tower to be installed on Alexandra House and removal of existing communications tower within 15 months of operation of the new tower) – would need to be amended to remove the section requesting details of the new tower as they were approved under application ref. 20230914 on 07.11.2023. The second part of the condition would need to be amended to state that within 15 months of the new tower being in operation (the applicant was asked what this date was and they have confirmed it was 30 November 2024) the existing communications tower on the PCC building shall be removed in its entirety and shall not be reinstated or relocated elsewhere in the application site at any time thereafter.

Condition 7 (Hard landscaping) - would need to be attached as this condition has not been discharged.

Condition 8 (Soft landscaping) - would need to be attached as this condition has not been discharged.

Condition 9 (Lighting) - would need to be attached as this condition has not been discharged.

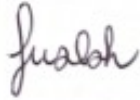
Condition 10 (Signage on PCC building) - would need to be attached as this condition has not been discharged.

Condition 11 (Details of refuse store) – should not be attached this condition was discharged under application ref. 20250770 on 24.09.2025.

Condition 12 (Condition assessment of the site's tidal Thames flood defence) – should not be attached this condition was discharged under application ref. 20250435 on 27.10.2025.

Condition 13 (Works to provide a minimum 20-year service life for the site's tidal flood defence) – should not be attached exactly as it is as the part of the condition which required details of the repair works to provide a minimum 20-year service life for the site's tidal flood defence was discharged under ref 20250435 on 27.10.2025. The second part of the condition would need to be attached to state that “Before any part of the site, which is to be redeveloped under this planning application, can be occupied, the applicant must carry out the repair works to provide a minimum 20-year service life for the site's tidal flood defence as approved under approval of condition application ref. 20250435.

Condition 14 (Development to be carried out at all times in accordance with the CEMP) – would still need to be attached as although the development has been commenced it has not as yet been completed.

Case Officer:	Ms Rebecca Harrison	Team Leader:	Mrs Faye Walsh
Signed:	<i>Rebecca Harrison</i>	Signed:	
Dated:	02 December 2025	Dated:	03 December 2025