

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

Our ref: KT/2023/130393/03-L01
Your ref: 20221294
Date: 24 March 2023

Dear Rebecca

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

Port Of London Authority, London River House, Royal Pier Road, Gravesend, Kent, DA12 2BG

Thank you for consulting us on 1 March on additional information which responds to our objection to the proposal. Following further consideration and a follow up explanatory meeting **we can remove our objection on the basis that the following flood risk and biodiversity planning conditions are applied to any planning permission granted.**

Flood Risk

The proposed development will only meet the National Planning Policy Framework's requirements in relation to flood risk if the following planning conditions are included.

Condition 1

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 line with the National Planning Policy Framework (NPPF).

Condition 2

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 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 line with the National Planning Policy Framework (NPPF).

Flood Risk Activity Permit (FRAP) Informative

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 riverbank, 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. In preparation for the required FRAP, we would require the application to be supported by a detailed method statement.

It is likely that a FRAP would be required for the demolition work. We would require for the applicant to submit a method statement for these works with a consideration for any possible interaction with buried elements that form part of the tidal flood defence (such as tie rods).

Future Thames Barrier Informative

The Thames Estuary 2100 Plan (the Plan) sets out how we and our partners can work together to manage tidal flood risk in the Thames Estuary, from now and into the next century. It is an adaptive plan, ensuring current standards of flood protection provided by the existing tidal defence system are maintained or improved taking into account the effects of climate change e.g. sea level rise. We expect the Thames Barrier to continue to protect London from tidal flooding up until 2070, but over the longer term the Plan, published in 2012, sets out the strategic direction and several options for managing tidal flood risk in the Thames Estuary.

Beyond 2070, the long term options to manage tidal flood risk include upgrading the existing barrier at Woolwich, 2 potential locations for a replacement barrier (Gravesend Reach or Long Reach) or flood storage.

Currently, all options continue to be investigated and assessed given that the decision on a preferred option is not planned until about 2040 when such a decision will be informed by the data and information available at the time.

This ongoing work is something the developer should be aware of as their site may be impacted in the future. We will contact the developer and landowners in the future should the Gravesend Reach area be taken forward as the preferred option. We would encourage the developer to regularly check Gov.uk for further info and up to date information.

Biodiversity

The proposed development will only meet the National Planning Policy Framework's requirements in relation to biodiversity if the following planning condition is included.

Condition 3

Prior to the commencement of 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 National Planning Policy guidance with particular reference to paragraphs 179-180.

Reasons

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.

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

Yours sincerely

Ms Laura Edwards

Planning Advisor

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Environment Agency

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