



Delegated Report

Approval of Details Application

Application no: 20241023

Location: Custom House The Terrace Gravesend Kent

Description: Application for approval of conditions 3, 4 & 5 attached to planning permission reference number 20240687 relating to a scheme for the design and construction of the proposed raised tidal flood defence, a long-term monitoring and maintenance plan for the flood defence structures and applying for as long as the development remains and details of the structural impact on the grade II listed gazebo

Applicant: Custom House (Gravesend) Limited

Site Visit Date: N/A

Relevant Planning History

Reference	Description	Decision	Decision Date
20241080	Application for the approval of condition 13 (External Facing Materials) attached to planning reference number 20210757.	Refused	31.01.2025
20240687	Application for the variation of condition 2 attached to planning permission reference number 20210757 for the redevelopment of the site including demolition of the southern part of the workshop building and existing corridor link at first floor level between Custom House and the outbuildings and conversion of Custom House, the coachhouse and outbuildings to include extensions, the Old Boathouse and the Boathouse with external alterations and erection of a new three storey building to provide 27 residential units with associated landscaping and parking. To allow; for internal and external alterations to facilitate additional bedspaces to increase the number of bedrooms in the development.	Permitted	05.03.2025
20240686	Application for Listed Building Consent for the redevelopment of the site including demolition of the southern part of the workshop building and existing corridor link at first floor level between Custom House and the outbuildings and conversion of Custom House, the coachhouse and outbuildings to include extensions, the Old Boathouse and the Boathouse with internal and external alterations and erection of a new three storey building to provide 27 residential units with associated landscaping and parking.	Permitted	05.03.2025

20240563	Application for non-material amendment to planning permission reference number 20210757 to allow removal of reference to housing mix from application description.	Permitted	22.07.2024
20240449	Application for approval of condition 3 attached to planning permission reference number 20210757 relating to The Construction Environmental Management Plan (CEMP).	Approved	04.10.2024
20240443	Application for approval of condition 6 attached to planning permission reference number 20210757 relating to details of the measures which shall be undertaken to divert the public sewer(s) underneath the site.	Approved	16.08.2024
20240285	Application for approval of condition 4, 5, 7 and 8 attached to planning permission reference number 20210757 relating to a strategy to deal with the potential risks associated with any contamination of the site, particularly the workshop and boathouse (4), the implementation of a programme of archaeological work in accordance with a written specification and timetable (5), a detailed sustainable surface water drainage scheme (7) and a landscape management plan detailing how the shingle beach habitat and other envisaged ecological enhancements within the site will be maintained (8).	Approved	16.07.2024
20210758	Application for Listed Building Consent for the redevelopment of the site including demolition of the southern part of the workshop building and existing corridor link at first floor level between Custom House and the outbuildings and conversion of Custom House, the coachhouse and outbuildings to include extensions, the Old Boathouse and the Boathouse with internal and external alterations and erection of a new three storey building to provide 27 residential units (6 x 1 bed, 15 x 2 bed and 6 x 3 bed) with associated landscaping and parking.	Permitted	24.11.2023
20210757	Redevelopment of the site including demolition of the southern part of the workshop building and existing corridor link at first floor level between Custom House and the outbuildings and conversion of Custom House, the coachhouse and outbuildings to include extensions, the Old Boathouse and the Boathouse with external alterations and erection of a new three storey building to provide 27 residential units (6 x 1 bed, 15 x 2 bed and 6 x 3 bed) with associated landscaping and parking.	Permitted	24.11.2023

Planning permission was granted for 'Redevelopment of the site including demolition of the southern part of the workshop building and existing corridor link at first floor level between Custom House and the outbuildings and conversion of Custom House, the coachhouse and outbuildings to include extensions, the Old Boathouse and the Boathouse with external alterations and erection of a new three storey building to provide 27 residential units (6 x 1 bed, 15 x 2 bed and 6 x 3 bed) with associated landscaping and parking on the 24 November 2023. This was subject to a number of conditions including nos. 9, 10 & 11 which this application originally sought to discharge.

Listed Building Consent was also granted for 'Listed Building Consent for the redevelopment of the site including demolition of the southern part of the workshop building and existing corridor link at first floor level between Custom House and the outbuildings and conversion of Custom House, the coachhouse and outbuildings to include extensions, the Old Boathouse and the Boathouse with internal and external alterations and erection of a new three storey building to provide 27 residential units (6 x 1 bed, 15 x 2 bed and 6 x 3 bed) with associated landscaping and parking under application ref. 20210758 on 24 November

2023.

Following this the applicant submitted an application for a non-material amendment to planning permission reference number 20210757 to allow removal of the reference to the housing mix from the application description. This was permitted on 22 July 2024 and the effect of this decision amended the description of the development of planning permission reference 20210757 to the following:

Redevelopment of the site including demolition of the southern part of the workshop building and existing corridor link at first floor level between Custom House and the outbuildings and conversion of Custom House, the coachhouse and outbuildings to include extensions, the Old Boathouse and the Boathouse with external alterations and erection of a new three storey building to provide 27 residential units with associated landscaping and parking.

With the reference to the housing mix removed from the description the applicant then submitted two applications for consideration – a variation of condition application to planning permission ref. 20210757 (ref. 20240687) and a new Listed Building Consent application (ref. 20240686) given that amendments cannot be made to a Listed Building Consent.

The variation of condition application ref. 20240687 was for 'Application for the variation of condition 2 attached to planning permission reference number 20210757 for the redevelopment of the site including demolition of the southern part of the workshop building and existing corridor link at first floor level between Custom House and the outbuildings and conversion of Custom House, the coachhouse and outbuildings to include extensions, the Old Boathouse and the Boathouse with external alterations and erection of a new three storey building to provide 27 residential units with associated landscaping and parking. To allow; for internal and external alterations to facilitate additional bedspaces to increase the number of bedrooms in the development' which was approved on 5 March 2025

The fresh Listed Building Consent application ref. 20240686 was for 'Application for Listed Building Consent for the redevelopment of the site including demolition of the southern part of the workshop building and existing corridor link at first floor level between Custom House and the outbuildings and conversion of Custom House, the coachhouse and outbuildings to include extensions, the Old Boathouse and the Boathouse with internal and external alterations and erection of a new three storey building to provide 27 residential units with associated landscaping and parking which was approved on 5 March 2025.

Following the approval of application ref. 20240687 this means that condition nos. 9, 10 and 11 and the reference number of the approval 20210757 have now changed to condition nos. 3, 4 & 5 and the approval is ref. 20240687. The agent was asked if they agreed to an amended description as follows:

Application for approval of conditions 3, 4 & 5 attached to planning permission reference number 20240687 relating to a scheme for the design and construction of the proposed raised tidal flood defence, a long-term monitoring and maintenance plan for the flood defence structures and applying for as long as the development remains and details of the structural impact on the grade II listed gazebo

The agent has confirmed that they agree to this revised description.

The information that has been submitted with this application is:

Originally submitted

Application form;
Drawing no. 1 of 1 – Intrusive Inspection Plan;
Calculation method: Eurocode 3 – Part 5
Planning condition 11 letter;
Drawing no. 1 of 1 – River Wall tide levels;
British Geological Survey ID: 725567;
British Geological Survey ID: 725571;
British Geological Survey ID: 725570;
British Geological Survey ID: 725569
British Geological Survey ID: 725568;

Revised information submitted

Drawing no. CH - AA - XX - XX - DC - E- 0101 Rev. P03 – Proposed Sea Defence Wall Plan;
Drawing no. CH - AA - XX - XX - DS - E- 0200 Rev. P04 – Proposed Wall Sections Sheet 1/3;
Drawing no. CH - AA - XX - XX - DS - E- 0202 Rev. P04 – Proposed Wall Sections Sheet 3/3;
Drawing no. CH - AA - XX - XX - DS - E- 0201 Rev. P04 - Proposed Wall Sections Sheet 2/3;
Sea Wall Maintenance Strategy 20 January 2025 Rev. B;
Delivery Methodology Ref: F530 Issue 1.1 (April 2018) Rev. 05;
Structural Report 20 January 2025 Rev B;
Letter from Adkins Consultants Ltd to Ms Laura Edwards dated 20/01/2025;
Drawing no. CH - AA - XX - XX - DC - E- 0100 Rev. P03 – Existing Sea Defence Wall Demolition Plan;
Drawing no. CH - AA - XX - XX - TG - E- 0001 Rev. P4 – Drawing Register Sheet;

Superseded

~~Sea Wall Maintenance Strategy 16 October 2024 Rev. A;
Structural Report 16 October 2024 Rev. A;
Delivery Methodology Ref: F530 Issue 1.1 (April 2018) Rev. 04;
Drawing no. CH - AA - XX - XX - DS - E- 0200 Rev. P03 – Proposed Wall Sections Sheet 1/3;
Drawing no. CH - AA - XX - XX - DS - E- 0202 Rev. P03 – Proposed Wall Sections Sheet 3/3;
Drawing no. CH - AA - XX - XX - DS - E- 0201 Rev. P03 – Proposed Wall Sections Sheet 2/3;
Drawing no. CH - AA - XX - XX - DC - E- 0100 Rev. P03 – Existing Sea Defence Wall Demolition Plan;
Drawing no. CH - AA - XX - XX - DC - E- 0101 Rev. P03 – Proposed Sea Defence Wall Plan;
Delivery Methodology Ref: F530 Issue 1.1 (April 2018) Rev. 04;~~

Consultations

Environment Agency – 18/12/2024 (first comment)

We **do not recommend the discharge of Conditions 9 and 10** for the reasons set out below.

Flood Risk

The report submitted is very thorough and looks very positive. This is not an objection in principle. However, we would like to ask some further questions for clarification under policies 170 and 181 of the National Planning Policy Framework.

Long-term Monitoring and Maintenance Plan

We welcome the proposal to replace the floodwall, and this proves to be a more robust solution for the flood defence. However, we are not confident that ultrasonic thickness testing can be performed if the sheet pile has been encased in concrete. Flexing of the concrete may cause the concrete cover to crack and break prematurely. We do not believe that encasing the sheet pile wall with concrete will secure the condition of the sheet pile for the remainder of its lifetime. This is because the ultrasonic testing proposed may be ineffective and areas that require attention due to degradation over time may be missed and not remediated.

Additionally monitoring of the sheet pile wall will be very difficult to perform without intrusive testing.

Monitoring Schedule

It is our view that the visual inspection could be done annually for the first 3 years and then it could be relaxed to be visually inspected every 5 years if the river wall is to be replaced fully.

Overcoming Our Objection

We request clarity on the detailed design of the new flood defence in line with the comments above to ensure that it will be fit for purpose for the lifetime of the development in accordance with policies 170 and 181 of the National Planning Policy Framework.

Additional Comments: Impact of the flood defence works on the Gazebo Building

We welcome the proposed secure exclusion zone to be established around the gazebo to safeguard the structure from the works being carried out in close-proximity. A structural assessment has determined that the proposed design and construction of the new flood defence wall will have no or very little impact on the Grade II Listed gazebo.

We have no objections to the discharge of conditions 9 and 10. We are pleased to see that the flood defence will be replaced with a sheet pile wall with a lifetime of the defence being in accordance with the lifetime of the development.

Further Technical Comments

The submitted document, 'Delivery Methodology, REF: F530 Issue 1.1 (April 2018), Section 1, details that there will be an installation of a new reinforced concrete wall to reflect the existing construction will be installed as a replacement for an existing floodgate'. This contradicts the updated submitted plans within the 'Adkins Consultants Ltd, Custom House, Proposed Sea Defence Wall Plan, Ref: CH-AA-XX-XX-DC-E-0101, Rev: P03, Date: 05.11.2024', which details a continuous sheet pile wall behind the existing flood defence wall, with no concrete present and the removal of the flood gate.

Therefore, the applicant should update their Delivery Methodology to reflect the changes in the plans regarding the flood defence wall.

No response from:

- GBC Conservation Officer

Analysis

Assessment of condition nos. 3 & 4 of planning permission ref. 20240687

Condition nos. 3 & 4 are as follows:

Condition 3

3. Within six months of the date of this permission and before any work other than investigation work commences affecting the River Thames tidal flood defence structures, a scheme for the design and construction of the proposed raised tidal flood defence shall be submitted to, and approved in writing by, the Local Planning Authority, in consultation with the Environment Agency. The scheme of works shall include:

- *that all new flood defence assets shall be designed with a lifetime of no less than 100 years from the date the development is expected to be completed, with a defence crest level no lower than 8.00 metres above Ordnance Datum (mAOD);*
- *that the design shall be supported by structural and stability calculations and any required ground investigation works;*
- *details of how the improved flood defence structures will tie in to the flood defence line at the neighbouring sites both upstream and downstream;*
- *as far as reasonably practical, the removal of buried obstructions within 3.9 metres landward of the proposed tidal flood defence;*
- *a detailed method statement and sequence of works plans;*
- *details of existing and proposed underground services within 3.9 metres of the proposed tidal flood defence;*
- *That the existing site tidal flood defences, including tidal flood gate, will be demolished to at least ground level and the flood gate will be replaced with a continuous, fixed tidal flood defence;*
- *the timing of implementation of the works making up the scheme.*

Reason: *To minimise the risk of flooding to the surrounding built environment, to protect the development from flooding for its lifetime including with climate change induced sea level rise, and to mitigate the environmental impacts of the development in line with the Thames Estuary 2100 plan in accordance with Policy CS18 of the Gravesham Local Plan Core Strategy (September 2014) and section 14 of the National Planning Policy Framework (2024).*

Condition 4

4. *Within six months of the date of this permission, a long-term monitoring and maintenance plan for the flood defence structures and applying for as long as the development remains shall be submitted to, and approved in writing by, the Local Planning Authority, in consultation with the Environment Agency. The long-term monitoring and maintenance plan shall include:*

- details of how and when the flood defence structures will continue to be inspected and tested;*
- success criteria for the condition of each element of the flood defence structures.*

Reason: *To minimise the risk of flooding to the surrounding built environment and to protect the development from flooding for its lifetime including with climate change induced sea level rise in accordance with Policy CS18 of the Gravesham Local Plan Core Strategy (September 2014) and section 14 of the National Planning Policy Framework (2024).*

In relation to condition nos. 3 & 4 of 20240687 (previously nos. 9 & 10 of ref. 20210757) originally the Environment Agency advised that they welcomed the proposal to replace the floodwall and that this would prove to be a robust solution for the flood defence. However, they were not confident that ultrasonic thickness testing could be performed if the sheet pile has been encased in concrete. Also, that flexing of the concrete may cause the concrete cover to break and crack prematurely and they did not consider that encasing the sheet pile wall with concrete would secure the condition of the sheet pile for the remainder of its lifetime. This is because the ultrasonic testing proposed may be ineffective and areas that require attention due to degradation over time may be missed and not remediated and additionally monitoring of the sheet pile wall will be very difficult to perform without intrusive testing. In order to overcome their objection the EA requested clarity on the detailed design of the new flood defence in line with their comments to ensure that it will be fit for purpose for the lifetime of the development.

In response to the EA's comments on condition nos. 9 & 10 the applicant submitted revised information. The revised drawings show that the concrete cover has been removed and that there will be a stronger coating of the sheet piles; the visual monitoring schedule has also been adjusted in line with the EA's comments.

The EA were re-consulted on this revised information and they have advised that condition nos. 3 & 4 of 20240687 (previously nos. 9 & 10 of ref. 20210757) can now be discharged. They advise that they are pleased to see that the flood defence will be replaced with a sheet pile wall with a lifetime of the defence being in accordance with the lifetime of the development.

As such it is considered that condition nos. nos. 3 & 4 of application ref. 20240687 (previously nos. 9 & 10 of ref. 20210757) can now be discharged.

Condition 5

Condition no. 5 is as follows:

5. *The designing of the new flood defence wall subject to condition 3 shall consider the structural impact on the grade II listed gazebo as well as its access and use. This impact shall be demonstrated through the submission of a report to be submitted to the Local Planning Authority within 6 months of commencement of the development. Should it be the case that the impact on the gazebo would be such that it cannot remain in situ a detailed scheme for the re-location of the gazebo to within the site (south of the new flood defence wall) shall be submitted to and approved in writing by the Local Planning Authority. The scheme shall include a detailed method statement of how the gazebo would be moved which should ideally be in one piece rather than disassembled and rebuilt. The development shall be carried out and completed in accordance with the approved details prior to any part of the permitted development first being occupied or used.*

Reason: *In order to protect the architectural and historic importance of this grade II listed building 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.*

The plans show that there will be a secure exclusion zone established around the gazebo to safeguard it

from the works being carried out around the gazebo for the flood wall. A structural assessment has also been submitted that states that the proposed design and construction of the new flood defence wall will have no or very little impact on the Grade II listed gazebo. As such it is considered that the design of the new flood defence wall would protect the architectural and historic importance of the grade II listed gazebo and that therefore condition no. 5 of application ref. 20240687 (previously no. 11 of ref. 20210757) can now be discharged.

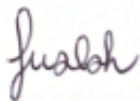
Conclusion

Sufficient information has now been submitted to discharge condition nos. 3, 4 & 5 attached to planning permission reference number 20240687 (previously nos. 9 & 10 of ref. 20210757).

Recommendation:

Approval of details

See draft Decision

Case Officer:	Ms Rebecca Harrison	Team Leader:	Mrs Faye Walsh
Signed:	<i>Rebecca Harrison</i>	Signed:	
Dated:	17th March 2025	Dated:	18 March 2025