

DELEGATED DECISION OFFICER REPORT

AUTHORISATION	INITIALS	DATE
File completed and officer recommendation:	NH	29/07/19 29/07/19
Planning Development Manager authorisation:	AN	29/7/19
Admin checks / despatch completed	EC	30/7/19
Technician Final Checks/ Scanned / LC Notified / UU Emails:	RW	30/7/19

Application: 18/01965/FUL **Town / Parish:** Clacton Non Parished

Applicant: Miss Linda Barber

Address: 5 Singer Avenue Jaywick Clacton On Sea

Development: Change of use of land for siting of mobile home for holiday occupancy.

1. Town / Parish Council

Clacton is non parished.

2. Consultation Responses

Environment Agency
(Amended)

No objection to this planning application, providing that you have taken into account the flood risk considerations which are your responsibility. We have highlighted these in the flood risk section below.

Flood Risk

Our maps show the site lies within tidal Flood Zone 3a defined by the 'Planning Practice Guidance: Flood Risk and Coastal Change' as having a high probability of flooding. The proposal is for a holiday use, mobile home. Provided the mobile home is to be used for short term holiday use, the vulnerability classification of the development is considered as 'More Vulnerable'. However if the mobile home is used all year round for residential use they would then be classed as 'Highly vulnerable' development and should not be permitted in Flood Zone 3 and the Exception Test is required in Flood Zone 2. If users of the development function as residents rather than holiday makers, in the event of a flood, they may have no other place of residence available and could lose all of their possessions. You should consider the flood zone 'compatibility' in accordance with Table 3 of the PPG. If you are satisfied that the application passes these Tests and will be safe for its lifetime, we would recommend a condition that the proposed mobile home shall remain for holiday use only is appended to any permission granted. To assist you in making an informed decision about the flood risk affecting this site, the key points to note from the submitted FRA, are:

Actual Risk

The site is currently protected by flood defences with an effective crest level of 4.95 m AOD which is above the present-day 0.5% (1 in 200) annual probability flood level. Therefore the site is not at risk of

flooding in the present-day 0.5% (1 in 200) annual probability flood event. The defences will continue to offer protection over the lifetime of the development, provided that the hold the line SMP policy is followed and the defences are raised in line with climate change, which is dependent on future funding. At the end of the development lifetime with climate change applied to the design 0.5% annual probability flood event, if the SMP policy is not followed then through overtopping of the current defences the resulting on-site flood level would be up to 5.5m AOD.

If you feel you do not have enough information concerning flood risk to make an informed decision then a GPS verified topographic survey should be undertaken, in order to determine possible flood depths.

Residual Risk

Our 2018 Coastal Breach modelling shows that in a breach scenario the site could experience flood depths of over 2 metres during the 0.5% (1 in 200) annual probability including climate change breach flood event and over 2 metres during the 0.1% (1 in 1000) annual probability including climate change breach flood event. You may wish to ask the applicant to provide a breach assessment for the development site in their FRA so that you can make a more informed decision on flood risk.

Therefore assuming a velocity of 0.5m/s the flood hazard is danger for all including the emergency services in the 0.5% (1 in 200) annual probability flood event including climate change. A Flood Evacuation Plan has been proposed. The safety of the occupants of the holiday mobile home is reliant on an emergency flood plan that deals with matters of evacuation. In all circumstances where warning and emergency response is fundamental to managing flood risk, we advise you to formally consider the emergency planning and rescue implications when making your decisions.

Shoreline Management Plan The current defences protect this community against a tidal flood with a 0.5% (1 in 200) annual probability of occurrence. However, the impacts of climate change on sea levels over the development's lifetime will gradually reduce the level of protection afforded by the defences if they are not raised within this timeline. Without the raising of the defence, the site could flood should a tide with a 0.5% (1 in 200) annual probability flood event plus climate change occur, which could be contrary to the advisory requirements of Paragraphs 059 and 060 of the National Planning Policy Framework's Planning Practice Guidance. These advise that there should be no internal flooding in 'more vulnerable' developments from a design flood. This could also present challenges to the safety of the users of the buildings and a future reliance on evacuation or emergency response.

The SMP policy is aspirational rather than definitive, so whether the defences are raised or reconstructed in the future will be dependent on the availability of funding. The level of funding that we can allocate towards flood defence improvements is currently evaluated through cost benefit analysis, and any identified shortfalls in scheme funding requirements would require partnership funding contributions from other organisations. When determining the safety of the proposed development, you should take this uncertainty over the future flood defences and level of flood protection into account. This may require consideration of whether obtaining the funds necessary to enable the