



Robert Davis
Rochford District Council
Planning Department
3-19 South Street
Rochford
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Our ref: AE/2017/121903/01-L01
Your ref: 17/00750/FUL
Date: 30 August 2017

Dear Mr Davis

DEMOLITION OF EXISTING HOLIDAY HOME CARAVANS AND ERECT 14NO. 2 BEDROOM RAISED DWELLINGS. BRANDY HOLE YACHT CLUB, KINGSMANS FARM ROAD, HULLBRIDGE, SS5 6QB

Thank you for your consultation received on 10 August 2017. We have inspected the application, as submitted, and are raising a holding objection on Access and Maintenance grounds. We have no objection on Flood Risk grounds, because the site is currently defended and the Shoreline Management Plan (SMP) policy for this area has an aspiration for hold the line. If the SMP policy is not taken forward the development would be unsafe in the future.

Access and Maintenance of Flood Defences

The proposed raised properties at the eastern side of the site are within the maintenance zone at the toe of the seawall, and would inhibit the cutting of the tidal defence. Access to the EA-maintained sluice outfall Kingsmans Farm No.3 (grid reference TQ8250495700) would also be further inhibited. The construction of the properties adjacent to the toe of the defence would also significantly inhibit any future maintenance to the steel sheet piles that form the defence upstand, and the seaward revetment.

If our maintenance at this location is to continue, a minimum 7m wide strip must be left clear at the toe of the tidal defence, which is not to be included in the gardens of the properties.

We are therefore raising a holding objection because the development could restrict essential maintenance and emergency access to the flood defences. The permanent retention of a continuous unobstructed area is an essential requirement for future maintenance and/or improvement works.

Overcoming our objection

You can overcome our holding objection by submitting information which covers the deficiencies highlighted above and demonstrates that the development will not increase risk elsewhere and where possible reduces flood risk overall. This could be achieved by maintaining 7m clearance from the toe of the landward face of the defence. If this cannot be achieved we are likely to maintain our objection to the application.

Informative – Environmental Permit for Flood Risk Activities

The applicant needs an environmental permit for flood risk activities because they want to do work in, under, over or within 16m from a tidal main river and from any flood defence structure or culvert. The River Crouch, is designated a ‘main river’.

Application forms and further information can be found at:

<https://www.gov.uk/guidance/flood-risk-activities-environmental-permits>. Anyone carrying out these activities without a permit where one is required, is breaking the law.

At this time the proposed development design is unacceptable for the reasons highlighted above and would not receive our consent.

Biodiversity

The development site is adjacent to the Crouch and Roach Estuaries SSSI, SPA, Ramsar sites and the Essex Estuaries SAC and there is a risk of disturbance to overwintering birds in the estuary. We advise that the advice of Natural England is followed on this issue.

Protected species

We note the reliance on a one-off survey of water voles from 2012 which concluded that they were absent from the borrowdyke behind the seawall. Given the passage of five years, we believe that conditions in the borrowdyke may have changed, and voles may now be present. A repeat survey at a more appropriate time of year by a suitably qualified ecologist may be necessary.

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 new dwelling chalets, which is classified as a ‘more vulnerable’ development, as defined in [Table 2: Flood Risk Vulnerability Classification](#) of the Planning Practice Guidance. Therefore, to comply with national policy the application is required to pass the Sequential and Exception Tests and be supported by a site specific Flood Risk Assessment (FRA).

To assist you in making an informed decision about the flood risk affecting this site, the key points to note from the submitted FRA, referenced the yacht Club at Brandy

Hole and dated 26 July 2017, are:

Actual Risk

- The site is currently protected by flood defences with an effective crest level of 4.80m AOD which is above the present-day 0.5% (1 in 200) annual probability flood level of 4.63m AOD. 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.
- If the SMP policy is not followed then at the end of the development lifetime, the 0.5% (1 in 200) annual probability including an allowance for climate change flood level of 4.95m AOD, would overtop the existing defences by 0.15m AOD.

Residual Risk

- The FRA does not explore the risk of a breach of the defences. Our undefended in channel flood levels could reach 5.26m AOD in the 0.5% (1 in 200) annual probability including climate change flood event, and could reach a flood level of 5.55m AOD in the 0.1% (1 in 1000) annual probability including climate change flood event.
- We are unable to compare our modelled flood levels to site levels as a GPS verified topographic survey of the site has not been provided. The depths of flooding and hazard expected as a result of a breach is therefore unknown.
- You may wish to ask the applicant to provide a breach assessment or a topographic survey for the development site in their FRA so that you can make a more informed decision on flood risk.
- It is likely that the site and access and egress route will flood in the event of a breach given the proximity of the site to the defences. It is not possible to assess the safety of the access and egress route as a GPS verified topographic survey has not been provided so the depth of flooding is unknown.
- Finished Ground floor levels have not been provided, so the depth of flooding to the parking and bike sheds are unknown.
- Finished first floor levels have been proposed at 5.65m AOD and all habitable accommodation will be located on this level. This is 0.39m above the 0.5% annual probability breach flood level including climate change of 5.26m AOD and therefore will remain dry. Therefore there is refuge above the 0.1% (1 in 1000) annual probability breach flood level of 5.55m AOD.
- Flood resilience / resistance measures have not been proposed.

- A Flood Evacuation Plan has been proposed and is necessary to ensure the safety of the development in the absence of safe access with internal flooding in the event of a breach flood.

Further guidance has been provided in the Technical Appendix at the end of this letter.

We trust this advice is useful.

Yours sincerely,

A handwritten signature in black ink, appearing to be 'esh' or similar, written in a cursive style.

Miss Eleanor Stewart
Sustainable Places - Planning Advisor

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cc Mr Michael Neocleous