



**ENVIRONMENT  
AGENCY**

**Our Ref :** AE/2005/015844-1/1

**Your Ref :** 05/00644/COU

**Date :** 22 August 2005

Planning Department  
Rochford District Council  
Council Offices  
South Street  
Rochford  
Essex  
SS4 1BW

FAO: Ms Weiss, Rochford District Council  
Dear Ms Weiss

**USE OF LAND FOR STATIONING OF MOBILE HOMES FOR PERMANENT  
RESIDENCE, (RETROSPECTIVE APP.). SHANGRI-LA WEST CARAVAN PARK,  
KINGSMANS FARM ROAD, HULLBRIDGE.**

Thank you for referring the above application, which was received on 8th August 2005. We **object in principal** to the proposal and wish to make the following comments.

This site is located within Flood Zone 3 of the Environment Agency's Flood Zone Maps. The site is therefore considered to be at risk from the 1 in 200 year tidal flood and is classified as 'high risk' by PPG25, Par 30, table 1. Although the area does benefit from flood defences these do not offer an adequate standard of protection (i.e. they are not designed to a 1 in 200 year standard). Were they to be overtopped or breached the site would suffer rapid inundation, which would pose a significant risk to life and property.

PPG25 makes special mention of caravans and mobile homes located within floodplains. Par 70 states that *"Such development should be refused in the areas at highest risk [of flooding], where overtopping or breach of defences would lead to rapid inundation, as should proposed changes of use to residential mobile homes or permanent housing"*.

In addition, Par 69 states that *"Planning authorities should take [the risk of a breach in defences] fully into account when considering applications ...particularly in respect of single-storey developments with no means of escape to an upper floor. Subject to the sequential test in paragraph 30 and Table 1, such development should not be permitted where the existing flood defences, properly maintained and in combination with agreed warning and evacuation arrangements, would not provide an acceptable standard of safety"*.

The Rochford District Replacement Local Plan 2004 Policy NR9 requires all applications within Flood Zone 3 to be submitted with a Flood Risk Assessment. Whilst we support this policy in general we consider that, in this instance, the nature of the development and the standard of the flood defence are such that the application should be refused since the risks to life and property are unlikely to be satisfactorily minimised by on-site mitigation measures.

We therefore OBJECT IN PRINCIPAL to this application, in accordance with guidance in national policy.

If you have any queries please do not hesitate to contact me on 01473 706016.

Yours sincerely

A handwritten signature in black ink, appearing to read 'Stuart Rickards', written in a cursive style.

**STUART RICKARDS**  
**Planning Liaison Officer**

CC: J.W. Crudginton White Cliffs Parks Leisure Homes