

Variation of condition 2 of permission of SW/11/1522 to allow the use of the approved caravan site on a year round basis, Central Beach Holiday Park, Grove Avenue, Leysdown, Kent ME12 4QE

Flood risk assessment together with flood warning and evacuation plan

There is already planning permission for the use of land here for the siting of caravans and this number is to remain the same such that no additional caravans will be sited on the land compared to the existing planning position. Furthermore, the proposal presents the opportunity for conditions to be imposed so as to provide for reducing the level of potential risk to all residents/visitors, such as by requiring a further flood warning and evacuation plan if this is considered appropriate.

The proposal requires a Flood Risk Assessment (FRA) to be submitted as part of the site is shown as being situated in Flood Zones 2/3 of the Environment Agency's (EA) Flood Zone Maps. The FRA is intended to meet the spirit of and general principles contained in Paragraph 9 of the Technical Guidance to the National Planning Policy Framework (NPPF) but has not made any detailed technical assessment as the effect of the application is at worst neutral and offers the opportunity to reduce overall risk plus given the Environment Agency (in assessing an earlier extension of season here) noted that, whilst part of the site lies within the flood zone where development is not normally encouraged, the Environment Agency noted that part of the site lies at a higher level, and so could provide a refuge for residents should a flood even occur. The Agency therefore had no objection to that similar scheme subject to conditions.

Flood risk information for planning available on the Environment Agency website indicates around half of the site lies within Flood Zone 3 but benefits from sea defences. The proposal will only entail a very modest level of additional use of the caravan by way of some increased occupancy over two additional months in winter. The year round benefits to all users of the site arising from the proposed flood warning and evacuation plan are considered to outweigh any small increase in risk associated with the use of the site for two additional months. In the event that there should be a catastrophic flood event, being signed up to receive telephonic warning of any pending/potential flood events represents a significant benefit which should enable people to be evacuated off the site in good time so there would be no significant risk to life. As holiday units, any such flood event will not give rise to the loss of anyone's permanent home unlike the potential case if allowing full time residential use. The Interim Policy allows for parks in such locations to be used year round and for full residential occupancy subject to 'satisfactorily demonstrating that the proposal would result in no greater risk to life or property and where an appropriate flood evacuation plan would be put in place'. Whilst the usual raising up of caravan floor levels about 60cm above prevailing ground level and presence of flood defences should adequately reduce risk to life and property, in the event of an unforeseen catastrophic flood event the damage to caravans on residential sites will leave people homeless, unlike like holiday sites where the end result is simply damage to property, a much less onerous proposition. Any such damage would occur come what may as the units remain in situ all year round so in reality there is no additional risk as a consequence of being able to open all year round for holiday purposes, unlike full residential use when people would be made homeless and be far more likely to take a greater risk by staying in what is their home for longer rather than evacuating with nowhere specific to go and leaving pretty much all their worldly goods behind.

As outlined, the caravans approved here are allowed to remain in situ all year round and the modest extension to the season of the potential occupancy should not result in any

unacceptable additional risk to people using the caravans or in terms of possible off-site impacts. The risk in this area is considered to be low in the light of the defences in place. As this proposal may technically conflict with relevant policy and the restated guidance in the NPPF if regarded as representing a caravan site proposal (as opposed to an amendment to an existing fully developed site) then it is considered the circumstances warrant the scheme being supported as an exception. This isn't a new proposal for caravan park use but just seeks to extend the period when occupancy can take place.

The prospects for a major flood event are not considered to be significantly greater in the winter period but logically would have as much potential to occur (albeit extremely low) over the existing 'open' season when a period of severe winds and adverse tidal conditions could potentially raise water levels higher than under any normal circumstance has as much opportunity to occur. Such an event seems to have as much potential in the current holiday static caravan open season as in the remaining winter period. It is considered that implementing appropriate flood risk management measures represents a greater overall reduction in risk compared to the modest reduction if the closed period was to be retained. The best way to reduce flood risk would appear to be to reduce the potential risk for everyone at all times of year by ensuring there is sufficient provision of adequate EA flood warnings and an evacuation plan and procedure are put into place. The implementation of the evacuation procedures would then occur upon receipt of the EA Flood Alert (and in conjunction with monitoring and local observation) so ensuring a dry evacuation prior to any potential flooding at the site. On the face of it, the application offers the opportunity to reduce risk. If there is to be no raising of the defences, these could potentially be over-topped in the future if the worst case scenario of sea level rises through climate change coupled with adverse conditions came into effect. However, the length of notice time of a potential over-topping should be more than adequate to evacuate the site owing to long lead-in time given by tidal meteorological warning of such a possibility.

Ensuring everyone leaves the park before it could flood is the safest way to deal with the potential flood issue here so better ensuring the future safety and well being of people stopping on the park and their property.

The development will not increase the number of people at risk from flooding as the number of caravans allowed here caravans will remain the same. The opportunity to now review and re-impose conditions in respect of matters such as flood warning and evacuation will ensure that the overall flood risk and potential future flood risk associated with the use of the site should be reduced as a consequence of this proposal.

The scheme will have no impacts on the ability of the site to absorb/deal with surface water as there will be no increase in surface water discharging to the ground - run off will remain as existing.

In the circumstances set out is is not considered likely that the he Sequential Test and Exception Test will require to be applied by the Local Planning Authority in any detailed manner - the need for the development to be located here as opposed to anywhere in an area of a lower risk of flooding is self evident.

The implementation of the Flood Warning and Evacuation Plan also helps this scheme meet the Exceptions Test by helping ensure that flood risk to people and property are managed satisfactorily and allowing necessary development to go ahead here as there are no suitable or available sites at lower risk of flooding in this vicinity. The site is in an

accessible location with good access to local shops/services/attractions and public transport. The benefits of the development are considered to outweigh the small increase in the risk of flooding. This would offer benefits that outweigh the risk of flooding. The sea defences should ensure that the site will be safe for the lifetime of the development.

The following flood warning and evacuation procedure is considered appropriate here and provides additional benefit to warrant approving this modest scheme by ensuring flood risk implications are reduced compared to the prevailing situation.

Flood warning and evacuation plan

The Environment Agency (EA) operates a flood warning and alert service in areas at risk of flooding from rivers or the sea over 24 hours a day, 365 days a year. If flooding is forecast, warnings are issued using a set of easily recognisable codes which will be displayed at the site on a notice board at the point of access into the main body of the park:

- **Flood Alert** - A Flood Alert means that flooding is possible and that occupants need to be prepared.
- **Flood Warning** - means that flooding is expected and that occupants should take immediate action. Occupants should take action when a flood warning is issued and not wait for a severe flood warning.
- **Severe Flood Warning** - means that there is severe flooding and danger to life. These are issued when flooding is posing significant risk to life or disruption to the community.

Action to be taken in the event of Alarm being raised or Flood Warning being received:

The Park Manager will be registered with the EA's Flood Warnings Direct (FWD) system. Other regular visitors will be recommended to sign up to the FWD. If a Flood Warning is issued for the area then the occupants and Park Manager will be warned of the threat in advance of flooding by the EA, so giving at least two hours warning.

Flood Alert – Phase One

The Manager will attempt to contact all occupants and any guests in case they are unaware of potential flooding. In the event of a Flood Alert being received it will be ensured that they will both be aware of the possibility of flooding and they are familiar with the park's Flood Warning and Emergency Evacuation Procedures.

Flood Warning – Phase Two

The Manager will provide advice to all on the site on the course of action to take. If residents are in need of assistance then the Manager will assist or contact appropriate help. The Manager will liaise with the EA/Floodline regularly for general updates on the situation. If a Severe Flood Warning is issued, the residents should start phase 3 (Evacuation).

Severe Flood Warning – Phase Three

If a Severe Flood Warning is received the Manager will:
Raise the alarm and evacuate the park following established drill procedures described below.

Contact Emergency Fire Services if necessary and/or Environment Agency Floodline if event was not expected.

If safe to do so, locate and turn off key services - water, gas & electricity.

Following enquiries/assessment the park should either be evacuated or stood down as follows:

Evacuation

If the park needs to be evacuated, visitors should follow the evacuation route to the public highway and then north towards higher ground outside on the basis that flooding is not yet obstructing the egress route. Visitors evacuating should take any medicines needed, bank cards/books to access funds and wear suitable footwear to walk through water. They should switch off all power to their caravan with all power supplies serving the site switched off if such can be safely achieved.

If the flooding has already prevented safe use of the egress route, visitors should take refuge within their home/holiday unit and notify the emergency services. The Manager will confirm whether residents are within the property and contact the emergency services.

Evacuation Procedure

In the event of a Flood Warning alert the Park Manager will sound a siren audible across the site. The Manager and/or other nominated person(s) will check on all homes to ensure they have been evacuated, commencing with those vans known to be occupied by the more vulnerable (such as the elderly, disabled, young families).

Evacuation is to be undertaken by motor vehicle. All on the site will be evacuating by motor vehicle and will be asked to make their way to the park entrance and then travel to reach land identified as being outside of flood zones 2/3 so enabling safe access to areas outside of the areas at risk.

Part of site in Flood Zones 2/3 benefiting from defences



Footnote: Visitors will be advised to remove any essential items and pets and to leave their caravan secure, with all doors and windows closed and locked shut. No access or return to the site shall be allowed until the Flood Warning is declared No Longer in Force by the Environment Agency. Only the Manager may confirm to visitors that the warning is No Longer in Force.

Stand-down

Following confirmation from the Environment Agency, the decision can be taken to stand down when appropriate. In this eventuality, the park should return to normal following the agreed 'reoccupation' period/procedure.

Site Reoccupation