Reference: 06/13/0472/O

Parish: Gt. Yarmouth
Officer: Mr D Minns
Expiry Date: 26-11-2013

Applicant: Norfolk and Suffolk NHS Trust

Proposal: Demolition of two existing buildings and residential development of up to 79 units including of the Silverwood Centre and associated highway works.

Site: Northgate Hospital, Northgate Street, Great Yarmouth

REPORT

1. The Proposal

1.1 This is an outline planning application to establish the principle of development for up to 79 residential dwellings on the site with the means of access submitted as part of the application. Details of the layout, scale, landscaping and appearance of the proposed development are reserved for future determination.

1.2 The applicants have submitted an indicative layout of how the site can be developed and accommodate the number of units. In addition the development parameters have been introduced and it is envisaged that the development will be a mixture of two and three storeys. The plan shows an area of approximately 2,000 sqm of Public open space.

1.3 Vehicular access will be taken from Beaconsfield Road making improvements to the existing access which serves the former ambulance station. The existing access into the hospital will be retained but with sole access to the retained healthcare functions to the south of the site. Likewise the existing access onto Churchill Road will also be retained and allow the applicant to continue to gain access to the rear of the Resource centre for servicing but with no access to the residential development.

2. The Site

2.1 The site is approximately 2.2 hectares (5.2 acres) in area and forms part of the wider Northgate Hospital site, and situated approximately 1 mile north of Great Yarmouth town centre. The site also includes a strip of land with the Borough Councils ownership which currently provides an informal parking area adjacent to Beaconsfield Road.

2.2 The site is mostly vacant, the Victoria Block, Breydon Centre, Coastlands and Mortuary Block, having recently been demolished, together with a number of other ancillary buildings. A number of buildings do, however, remain, notably,

the Silverwood Centre in the south- western corner shown to be converted to five flats but the unit number is indicative only , and the building known as the Cranbrook Centre on the southern boundary towards the centre of the site along with the Tug store will be demolished. A large wall runs through the site, from west to east, and separates the former hospital site from the informal parking area currently owned by GYBC. This originally formed part of the retaining wall for a railway line, which has since been demolished leaving the wall now freestanding.

2.3 The site, which is broadly rectangular in shape, is bordered on the northern side by Beaconsfield Road, a predominantly residential street comprising terraced blocks of Victorian houses, and on the western side by Northgate Street, a more varied residential street with a number of commercial premises.

2.4 The southern boundary runs along the existing access road into the Hospital, and to the west the site borders Churchill Road, no through road providing access to the Borough Council's Depot. Beyond the wider Hospital, to the south is Estcourt Road, which has a mixed character consisting of some residential and some commercial/industrial units.

2.5 To the east, North Denes Road is a residential street. A low brick wall runs along the boundary with Northgate Street, and a brick and flint wall defines the boundary with Churchill Road. The boundary with Beaconsfield Road is marked by a row of concrete posts, and the southern boundary with the remainder of the Hospital site is undefined. There are a considerable number of trees located within the site, mostly in the north-western corner. Many of these are subject to a Tree Preservation Order

2.6 In The site is located within Flood Zone 3(a) of the Environment Agency flood risk map. The land rises from west to east, on the eastern boundary with Northgate Street it is approx. 1.5mAOD rising to approximately 2.2mAOD in the north eastern corner and approx.2.5m AOD in the south-eastern corner. .

2.7 Accompanying the application is a Design and Access Statement, Flood Risk Assessment, Noise Assessment, Transport Statement, Desk Study Land Contamination Survey, Utilities Statement Ecological Surveys.

3. Pre-application Public Consultation

3.1 The applicants in accordance with best practise undertook a public consultation event on the site in July this year. The results of the returned questionnaires submitted with this application show that there was a good deal of support for the application.

4. Consultations :-

4.1 Neighbours – 1 letter of objection concerned with noise during demolition and new build along with workers using residents parking spaces.

4.2 Highways – No objection in principle but various detailed comments including that the applicant is seeking address and an update on this along with highway response will be reported.

4.3 Environment Agency – Flood Risk This application is shown on our flood map to be in flood zone 3. We have reviewed the submitted information and are not raising an objection but have provided information on flood risk which you must consider prior to determining the application. We have also recommend conditions regarding the surface water and the potential contamination of the site to ensure the water environment is adequately protected should permission be granted. (see attached letter)

4.4 Emergency Planner – Comments to be reported.

4.5 Anglian Water –

a) Wastewater Treatment- The foul drainage from this development is in the catchment of Caister STW that at present has capacity for these flows.

b) Foul Sewerage Network – Development will lead to an unacceptable risk of flooding down stream nd mitigation in the form of the complete removal of all surface water flows will be required. The drainage strategy for the site should cover the procurement of the improvement works. We request a condition requiring the drainage strategy covering the issues to be agreed

c) Surface Water Disposal - The surface water strategy/ flood risk assessment is unacceptable. The application states only connection to soakaways, however the flood risk assessment dated August 2013 states that there are still surface water flows connecting to the combined sewer. We would therefore recommend that the applicant needs to consult with Anglian Water and the Environment Agency.

We request conditions requiring a drainage strategy covering the issues to be agreed.

1) No development shall commence until a foul water strategy has been submitted to and agreed in writing by the local planning authority. No dwellings shall be occupied until the works have been carried out in accordance with the foul water strategy so approved unless otherwise approved in writing by the local planning authority.

2) No development shall commence until a Surface Water Strategy has been submitted to and agreed in writing by the local planning authority No hard standing areas to be constructed until the works have been carried out in accordance with the foul water strategy so approved unless otherwise approved in writing by the local planning authority.

4.6 Essex and Suffolk Water –We would advise you that the existing apparatus does not appear to be affected by the proposal .We have no objection s to the

development subject to our requirements. A water service will require disconnection from the site. We give consent to this development on the condition that the new water mains are laid on the site, and that connection is made onto our Company network for each new dwelling for revenue purposes.

4.7 Natural England – advises your authority that the proposal, if undertaken in strict accordance with the details submitted, is not likely to have a significant effect on the interest features for which Great Yarmouth North Denes SPA and Breydon Water SPA and Ramsar have been classified. National England therefore advises that your Authority is not required to undertake an Appropriate Assessment to assess the implications on the site conservation objectives.

4.8 Planning Archaeologists Historic Environment Services – The proposal includes the demolition of the Cranbrook Centre –part of which appears to have originally formed part of the 19th Century workhouse at the site. Although the building has been extensively altered and its significance as a heritage asset diminished it is worthy of recording prior to its demolition. Request a condition requiring historic recording of the premises.

4.9 Norfolk County Council Infrastructure Requirements **-**The infrastructure, service and amenity requirements arising from the development are set out the County council's adopted Planning Obligation Standards. The County Council would raise an objection if the attached list of requirements were not satisfactorily dealt with in a legal agreement with the applicant No contributions will be sought for Nursery, High School and Sixth form (where there is existing capacity) however contributions will be sought for Primary school provision St Nicholas primary is oversubscribed by two places, library book provision at £60 per dwelling. To be secured by Section 106 agreement. One fire hydrant at developers cost to be secured by a condition.

4.10 Environmental Health – Comments with regard to issues associated with noise, contaminated Land and issues associated with noise from demolition and construction work. Conditions requested regarding hours of construction, control of dust and Contamination requires a Remediation Method Statement and full validation of the works carried out. In terms of Surface Water Disposal the site lies in the Northgate Critical Drainage area as identified by the draft Surface Water Management Plan. The applicant should give serious consideration to the disposal of surface water and encouraged to look at a sustainable solution

5. Policy:-

5.1 POLICY HOU4

PROPOSALS FOR RESIDENTIAL DEVELOPMENT IN EXCESS OF 10 DWELLINGS WILL BE REQUIRED TO COMPLY WITH THE FOLLOWING CRITERIA. *

(A) THE SITE SHOULD BE IN OR ADJACENT TO AN EXISTING SETTLEMENT;

(B) THE DEVELOPMENT SHOULD NOT EXTEND INTO OPEN COUNTRYSIDE UNLESS SPECIAL JUSTIFICATION IS GIVEN (FOR EXAMPLE, WHERE SIGNIFICANT ENVIRONMENTAL OR AMENITY GAINS COULD BE ACHIEVED TO THE BENEFIT OF THE COMMUNITY);

(C) SATISFACTORY ACCESS COULD BE MADE AVAILABLE AND TRAFFIC GENERATED BY THE PROPOSAL WOULD NOT HAVE A SIGNIFICANT EFFECT ON THE LOCAL HIGHWAY NETWORK THAT COULD NOT BE AMELIORATED BY FURTHER INFRASTRUCTURE PROVISION OR IMPROVED PUBLIC TRANSPORT LINKS;

(D) THE DEVELOPMENT WOULD BE OR HAS THE POTENTIAL TO BE WELL SERVED BY PUBLIC TRANSPORT;

(E) THERE WOULD BE NO LOSS OF SITES OF LANDSCAPE OR WILDLIFE IMPORTANCE;

(F) THERE WOULD BE NO LOSS OF BEST AND MOST VERSATILE AGRICULTURAL LAND OR AREAS OF SPECIAL LANDSCAPE VALUE;

(G) THERE WOULD BE NO HARM TO THE HISTORIC ENVIRONMENT; AND,

(H) SITES SHOULD NOT BE SUBJECT TO COASTAL (MARINE) EROSION OR BE SUBJECT TO FLOOD OR BE ON LAND OF KNOWN INSTABILITY.

* The above criteria may in exceptional circumstances not relate to all of the allocated sites.

5.2 POLICY HOU15

ALL HOUSING DEVELOPMENT PROPOSALS INCLUDING REPLACEMENT DWELLINGS AND CHANGES OF USE WILL BE ASSESSED ACCORDING TO THEIR EFFECT ON RESIDENTIAL AMENITY, THE CHARACTER OF THE ENVIRONMENT, TRAFFIC GENERATION AND SERVICES. THEY WILL ALSO BE ASSESSED ACCORDING TO THE QUALITY OF THE ENVIRONMENT TO BE CREATED, INCLUDING APPROPRIATE CAR PARKING AND SERVICING PROVISION.

(Objective: To provide for a higher quality housing environment.)

5.3 The National Planning Policy Framework (NPPF)

a) Paragraph 38 of the NPPF states:- For larger scale residential developments in particular, planning policies should promote a mix of uses in order to provide opportunities to undertake day-to-day activities including work on site. Where practical, particularly within large-scale developments, key facilities such as primary schools and local shops should be located within walking distance of most properties.

b) Paragraph 58 states *"Housing should be based on current and future demographic trends and the needs of different groups in the community"*

The NPPF also states as one of the core planning principles should underpin Plan making and decision-taking; this being:-

Encourage the effective use of land by reusing land that has been previously developed (brownfield land), provided that it is not of high environmental value.

6. Assessment :-

6.1 This is a brown-field site within the built up area of Great Yarmouth. The application is in outline with only the means of access to be determined as part of the applications and the number of residential units. In terms of the access highways have made a number of recommendations that the applicant is addressing and this includes a mini roundabout on to Beaconsfield.

6.2 Whilst the application is accompanied by indicated drawings showing a mix of dwelling types between two and three storeys, they are a good example of how the site could be developed and sets out the parameters for development and the conditions to be imposed on the planning permission should the application be granted planning consent. In addition to this the application will also need to be subject to a Section 106 Agreement under the Town and Country Planning Act for the provision of Affordable Housing, Open Space/play equipment and school places and library books as outlined above.

6.3 The main issues for Members to consider as part of the principle of development of this site at this stage is the fact that the site is shown to be in Flood Zone 3 of the Environment Agency Flood maps and that this is in area in Northgate that has identified as a Critical drainage area in the draft Surface Water Management Plan.

6.4 The letter from the Environment Agency (EA) clearly set out there recommendations for the proposal along with a comprehensive assessment of the site specific Flood Risk Assessment submitted with the application along with the conditions they require to be imposed should Members be minded to approve the application.

6.5 Within the letter from the EA reminds us as the Local Planning Authority (LPA) of the two fold test under the National Planning Policy Framework(NPPF) that should be undertaken namely the Sequential test and the Exception Test before the application is determined.

6.6 The NPPF requires that flood risk is taken into account in the planning process to avoid inappropriate development in areas at risk of flooding and to direct development away from areas at highest risk.

6.7 The Sequential Test requires us to be satisfied that the development offers wider sustainable benefits which out weigh the flood risk. The exceptions Test requires the submission of a Flood Risk Assessment (FRA) which demonstrates the development will be safe for the lifetime of the development without increasing flood risk elsewhere. The EA are satisfied that the FRA submitted with the application provided with the information to meet the needs of the exception tests and that they are not raising an objection provided we consider the development to be safe for the life time of the development.

6.8 In order for Members to understand the risk to this site extracts from text of the applicants FRA is attached to the report.

6.9 The FRA shows that the principle source of flooding is the River Bure which is 400m to the west. The risk of flooding from other sources such as ground water or surface water is low. Although the development can be made safe from flooding in the current situation taking into account the flood defences – the EA maps to not take into account the flood defences- the development is protected from tidal flooding for all events and including a the 1 in 1000 year tidal event. Over the life time of the development taking climate change however could lead to overtopping of the flood defences that would affect the development In addition , any form of breach failure of the defences during a flood event would also affect the development.

6.10 The FRA at Section 2 Research sets out the Flood Risk sources along with the current levels on the site and the associated risks to the site from flooding Section 3 includes a discussion on the flood leading to the conclusions and recommendations for minimum finished floor levels and flood resilient measures and techniques. In addition there should be a flood evacuation plan for the occupants of the dwellings.

6.11 The FRA also addresses the risk of surface water flooding in the area in and around the site as a result of its proposed development. Whilst the report puts asserts that the proposal with will incorporate a number of measures to reduce and deal with the surface water associated with the development it has been highlighted by the consultees of the need to incorporate a fully sustainable drainage system that does not put surface water into the sewerage system. Conditions are requested and set out above to address this issue.

7. Conclusion

7.1 In the current situation the site can be considered a sustainable location for development. The site makes good use of a brownfield site in a location that is close to all facilities. In the longer time, in terms of flood risk to the site, provided that any approval is subject to the finished floor levels and recommendations set out in the conclusions and recommendations in the FRA including a flood evacuation plan, it should enable this proposal to be considered a sustainable development safe for the lifetime of the development within a coastal community taking into account the vulnerability of its users without increasing flood risk else where. A new drainage system on site should also deal with surface water flooding.

7.2 Any decision to approve the application will be subject to the applicant entering into a section 106 Agreement commuted payments in relation to the non provision of the element play and open space not provided on site, together with an agreed level of social housing.

8. Recommendation

8.1 Approve subject to the applicant entering into a Section 106 Agreement with regard to affordable housing provision, contributions required by the County Council, together with a commuted payment in respect of the shortfall of open space provision, together with a capitalised maintenance sum for the open space provision on the site. The proposal is considered to comply with the above mentioned policies of the Great Yarmouth Borough-Wide Local Plan, subject to meeting the requirements of the Highway authority, Environment Agency, Anglian Water Archeologically and the Emergency Planning Officer. It would also meet the objectives of the NPPF.

1 Introduction and Client's Brief

1.1 Background

1.1.1 Rossi Long Consulting was commissioned by Norfolk & Suffolk NHS Foundation Trust to undertake a Flood Risk Assessment in respect of the proposed development at Northgate Street, Great Yarmouth.

1.1.2 An outline planning application is to be submitted for a residential development of up to 79 dwellings, which includes conversion of an existing building to residential.

1.1.3 The site is situated in Flood Zone 3, as shown on Environment Agency flood zone mapping, and a Flood Risk Assessment is required in accordance with the National Planning Policy Framework (NPPF).

1.1.4 This report is compiled with the benefit of our findings from local research, topographical survey and walk-over survey, and liaison with the Environment Agency with regard to potential flood levels.

1.2 Site Description and Proposals

1.2.1 The site of the proposals is the former Northgate Hospital that has occupied the site since just after the Second World War. Prior to this the site had been occupied by a workhouse from the late Victorian era. A location plan is included in Appendix A.

1.2.2 The former hospital has recently been demolished and a site survey / demolition plan is included in Appendix B.

1.2.3 The former site comprised buildings and hard paved areas, open spaces and car parking.

1.2.4 The proposals are for a residential development incorporating a mix of dwelling types, incorporating new two storey flats, three storey houses and the change of use conversion of an existing building for residential use. Details are shown on the Architect's layout plan included in Appendix C.

1.2.5 The Ordnance Survey grid reference for the site is TG 525 087.

1.3 Planning Policy and Flood Risk

1.3.1 The National Planning Policy Framework (NPPF) was published by the Department for Communities and Local Government in March 2012 and issued to Local Planning Authorities on 27 March 2012. It replaces a number of planning documents, including Planning Policy Statement 25: Development and Flood Risk. NPPF requires that flood risk is taken into account in the planning process, to avoid inappropriate development in areas at risk of flooding and to direct development away from areas at highest risk.

1.3.2 For site specific Flood Risk Assessments the main study requirement is to identify the flood zone and vulnerability classification relevant to the proposed development, based on an assessment of current and future conditions and taking climate change allowances into account. A site specific Flood Risk Assessment must demonstrate that the development will be safe for its lifetime, taking account of the vulnerability of its users without increasing flood risk elsewhere and, where possible, will reduce flood risk overall.

2 Research

2.1 NPPF and Environment Agency Flood Zones

2.1.1 Environment Agency flood zone mapping identifies areas at risk of tidal flooding with three levels of probability / severity:

- Flood Zone 3 is a 'high probability' flood zone that comprises land assessed as having a 1 in 200 or greater annual probability of sea flooding (greater than 0.5%) in any year.
- Flood Zone 2 is a 'medium probability' flood zone that comprises land assessed as having between a 1 in 200 and 1 in 1000 annual probability of sea flooding (0.5% to 0.1%) in any year.
- Flood Zone 1 is a 'low probability' zone that comprises land assessed as having a less than 1 in 1000 annual probability of sea flooding (less than 0.1%) in any year.

2.1.2 The site is shown on Environment Agency mapping to be in Flood Zone 3. A copy of the flood zone mapping is included in Appendix D.

2.1.3 Table 2: NPPF classifies residential development as 'more vulnerable' development in flood risk terms. All development proposals in this zone should be accompanied by a Flood Risk Assessment.

2.2 Flood Risk Sources

2.2.1 The principal flood risk source is from the River Bure 400m west of the site. The flood zones shown on the Environment Agency mapping relate directly to the risk of tidal flooding from the River Bure.

2.2.2 The River Bure flows into the River Yare in its lower reaches just downstream of Breydon Water. Both the River Yare and River Bure are strongly influenced by tidal conditions in the North Sea. As a consequence, there are flood protection measures for much of the Yare and Bure within the Great Yarmouth area.

2.2.3 Following consultation with the Environment Agency, the following modelled flood levels are confirmed for the River Bure:

1 in 200 year return period - 2.51m AOD

1 in 1000 year return period – 2.90m AOD

The levels are 'undefended' levels and relate to node point 2480 (see Environment Agency correspondence in Appendix E).

2.2.4 Ground levels have been established for the site and are shown on the survey drawing included in Appendix B. These are in the range of 1.58m AOD in the north-west corner and 2.75m AOD near to the south-east corner.

2.2.5 Surface water flooding occurs from either sheet run-off from adjacent land or from surcharged sewers. The site is in an area that has suffered from surface water flooding in the past. Northgate Street was flooded in 2007 at a time of prolonged and heavy rainfall. The site itself was not affected and Anglian Water has provided extensive improvements since that time to reduce the risk of this type of flooding occurring again in the future.

2.2.6 The site is located in the 'Northgate Area' as defined within the Great Yarmouth Borough Surface Water Management Plan. The drawing in Appendix F illustrates the critical drainage area and the predicted likelihood of surface water flooding. The site is not expected to be affected by these events.

2.2.7 Groundwater flooding occurs when water levels in the ground rise above surface elevations. Site investigation revealed no groundwater to 3.0m depth. Given the relatively flat terrain, the risk of flooding from groundwater is considered to be low.

2.2.8 This area of Great Yarmouth was extensively flooded in 1953 by a tidal surge in the North Sea when an inland flood height of 3.28m AOD was reached. Extensive flood defence works have been completed since that time and there are no reports of such flooding since. The site is however at risk of tidal flooding in the event of any form of flood defence failure.

2.3 Existing Flood Defences

2.3.1 The levels given in Section 2.2 are predicted 'undefended' tidal flood levels and the Environment Agency flood zone mapping shows the extent of inland flooding.

2.3.2 The River Bure is however a defended river protected to varying levels in the range of 2.85 - 3.02m AOD. The river frontage concerned is listed as Compartment F in the Environment Agency Strategy Review for Great Yarmouth.

2.3.3 The flood defences therefore provide protection to inland areas in excess of the current 1 in 200 year 'design flood' of 2.51m AOD.

2.4 Existing Surface Water Drainage

2.4.1 The hospital site was extensively hard paved and roofed, with existing discharges to the public sewer. The site is divided into three drainage areas with separate discharges to Northgate Street, Churchill Road and Estcourt Road. An existing impermeable area plan is included in Appendix G.

2.4.2 Anglian Water sewer records show 'combined' public sewers serve this area receiving all surface water run-off from the site.

2.5 Strategic Flood Risk Assessment

2.5.1 Great Yarmouth Borough Council has commissioned a Strategic Flood Risk Assessment (SFRA) to inform the preparation of local development documents and enable the Local Planning Authority to apply the Sequential approach to the site allocation process.

2.5.2 Environment Agency flood mapping does not take into account the effect of any flood defences. The flood zone mapping prepared for the SFRA takes defences into account and mapping shows that the site is not affected in the current 1 in 1000 year event due to the flood defences that are in place.

2.6 Ground Conditions

2.6.1 British Geological mapping shows the site is situated on superficial deposits of the North Denes Formation (Sands and Gravels). The underlying bedrock is the Crag Group (Sand and Gravel).

2.6.2 Site investigation has confirmed the presence of sands and gravels – details of which are included in Appendix H.

2.6.3 BRE365 porosity testing was also completed and gave a recommended soil infiltration rate in the range of 2.49 – 5.68 x 10^{-5}m/sec (see Appendix H).

3 Discussion

3.1 Flood Risk

3.1.1 The proposal for the site is for a residential development of up to 79 dwellings, which includes conversion of an existing building to residential (see Appendix C).

3.1.2 The principal flood risk to the site is from tidal inundation from the River Bure. Environment Agency flood risk mapping shows that the site is in Flood Zone 3, which is a 'high probability' flood zone. The flood risk source is from the River Bure situated west of the site.

3.1.3 The NPPF classifies residential use as 'more vulnerable' development. For more vulnerable development in Flood Zone 3, a Flood Risk Assessment should consider the risk of flooding from all sources, taking climate changes allowances into account.

3.1.4 The flood risk mapping shows the inland extent of potential flooding but ignores the presence of the defences. The SFRA has re-assessed the risk, taking the defences into account, and the mapping demonstrates that the site is protected from extreme flooding by these defences.

3.1.5 Flood levels provided by the Environment Agency for the 1 in 200 and 1 in 1000 year events, when compared with the flood defence levels, confirm that the site is protected from flooding from the River Bure in the current situation.

3.1.6 As far as we can ascertain, no surface water or other types of flooding have been recorded at this location. The site was flooded from the 1953 tidal event.

3.2 Flood Safety

3.2.1 It is a requirement of the NPPF that the users of the development must not be placed in danger from flood hazards and should remain safe throughout the lifetime of the proposed development.

3.2.2 Although the flood defences provide protection to the development from flooding in the current situation, NPPF climate change allowances are predicted to lead to defence overtopping in the future. In addition, the residual risk of flood defence failure also needs be considered.

3.2.3 The 'defended' flood levels provided by the Environment Agency, including allowance for climate change, are as follows:

1 in 200 year return period – 2.3m AOD

1 in 1000 year return period – 3.10m AOD

The levels are the predicted flood levels at node point 2480 within the site.

3.2.4 The 1 in 200 year flood level, including climate change allowance, is the 'design' flood level for the development. Ideally, all ground floor levels should be situated at 2.3m AOD or above. Where possible, a 'freeboard' allowance of 300mm should be added to this level to allow for wind and wave action and the potential for error within the flood modelling.

3.2.5 Site ground levels are in the range of 1.58 – 2.75m AOD and it would not be possible to achieve a minimum ground floor level of 2.6m AOD and maintain disabled access as required by the Building Regulations. The Environment Agency has advised that the 300mm freeboard is a recommendation rather than a necessity and has recommended consultation with the Great Yarmouth Emergency Planners.

3.2.6 The Emergency Planning Officer has advised that there needs to be a workable Flood Response Plan in place to ensure residents are alerted to a major flood event, with the emphasis on evacuation well before any possible flooding. The occupiers should register with the Environment Agency Automated Flood Warning System. The relevant flood warning area is:

O54FWCDV3A2 Town Hall Frontage to Northtown

Flood warnings would be triggered based on forecast water levels exceeding the following thresholds:

'FLOOD ALERT'	**1.90m AOD**
'FLOOD WARNING'	**2.78m AOD**
'SEVERE FLOOD WARNING'	**2.90m AOD**

The Environment Agency advises that a period of 6 - 12 hours is likely to be available between issue of warning to flooding of property.

3.2.7 An occupier's Flood Response Plan should be prepared and include procedures to be adopted on receipt of a flood warning. This should include a recommended route to high ground safe refuge. In this instance, North Denes Road is on rising ground above the extreme flood level of 3.1m AOD. The route will be dry given the 6 - 12 hours early warning available. An evacuation route plan is included in Appendix I.

3.2.8 A draft Flood Response Plan is included in Appendix J.

3.2.9 The new dwellings will have a minimum ground floor level of 2.3m AOD, which is at the 1 in 200 year flood level plus allowance for climate change. As this floor level does not provide the 300mm freeboard flood protection, all entrance doors will be provided with a built in facility to fit flood boards up to a level of 2.6m AOD in a flood event. In an extreme emergency, all dwellings will have an escape to a higher level situated above the 'extreme' 1 in 1000 year flood level of 3.1m AOD. For the new flats, a communal area will be provided at first floor level to act as a place of safe refuge.

3.2.10 The Silverwood Centre (Plots 48 - 52) currently has a floor level of 2.16m AOD. The details of the conversion are not included within the outline proposal but will be fully considered at the Reserved Matters stage. Where possible, the conversion will include the raising of the ground floor level to 2.3m AOD to correspond with the new houses and flats. A communal area can also be incorporated at first floor level to act as a place of safe refuge in an extreme emergency. The exact details can be agreed at the detailed design stage.

3.3 Flood Resilient Construction

3.3.1 The new dwellings should incorporate flood resilient construction at ground floor level within the development. This is to ensure that, if flooding does occur, damage will be minimised and allow faster recovery and re-occupancy.

3.3.2 Flood Resilient measures are considered in Communities and Local Government document 'Improving the Flood Performance of New Buildings: Flood Resilient Construction' (June 2007).

3.4 Surface Water Drainage

3.4.1 The Building Regulations 2000 Approved Document H3 requires that rainwater from buildings and paved areas shall discharge to one of the following, listed in the order of priority:

a) An adequate soakaway or some other adequate infiltration system or, where that is not reasonably practicable;

b) A watercourse or, where that is not reasonably practicable;

c) A sewer.

The Building Regulations therefore adopt a design philosophy that accords with sustainable drainage systems (SuDS).

3.4.2 The former hospital site had a positive outfall to the public sewer for all surface water run-off. The total impermeable area draining to the sewer is 10,288m^2 for a total site area of 22,000m^2 (46%).

3.4.3 Recent BRE365 soakage testing has confirmed free draining sand at the site and accordingly a surface water drainage strategy is proposed as follows:

(i) All roof water will drain to on-site soakaways designed for a 1 in 100 year storm event plus a 30% allowance for climate change.

(ii) Private roads, hardstandings and driveways will be permeable surfaces designed to store peak rainfall up to and including a 1 in 100 year storm event plus a 30% allowance for climate change. Permeable paving allows rainwater to infiltrate naturally into the ground whilst providing effective removal of urban pollutants.

(iii) The adoptable estate road will be positively drained via trapped road gullies to the public sewer. Highway drains will be offered for adoption with the roads under Section 38 of the Highway Act.

(iv) The revised drainage area connecting to the public sewer will be approximately 2150m^2 providing a 78% reduction in rainwater run-off to the sewer. The revised total run-off area for the site will be 9.8%.

3.4.4 The use of on-site soakaways and permeable surfaces complies with the first priority under the Building Regulations and provides a sustainable approach to rainwater management. A continued positive connection to the sewer for adoptable road drainage is proposed due to the difficulties in locating multiple highway soakaways 5m from dwellings and the road itself.

3.4.5 A drainage strategy drawing is included in Appendix K with surface water calculations in Appendix L.

4 Conclusions and Recommendations

As a result of this assessment, the following conclusions and recommendations have been reached:

4.1 The proposal is for the conversation of existing offices for residential purposes.

4.2 The principal flood risk source is tidal flooding from the River Bure. The risk of flooding from other sources, such as groundwater or surface water, is low.

4.3 The site is shown on Environment Agency mapping to be in Flood Zone 3. This is a high probability flood zone but this does not take into account the flood defences that are in place. When the flood defences are considered, the development is protected from this type of flooding for all events up to and including the 1 in 1000 year tidal event.

4.4 Although the development is safe from river flooding in the current situation, climate change allowances over the lifetime of the development could lead to overtopping of the flood defences that would affect the development. In addition, any form of breach failure of the defences during a flood event would also affect the development.

4.5 Flood defence works have recently been announced that will improve the flood defences in the centre of Great Yarmouth. The risk of flood defence overtopping and/or breach failure will be greatly reduced.

4.6 To reduce the risk of internal flooding, the new dwellings will have a minimum ground floor level of 2.3m AOD. In addition, threshold flood defence boards will be provided up to a level of 2.6m AOD. Flood resilient construction techniques will be used up to a level of 3.1m AOD.

4.7 The residents should prepare a Flood Response Plan and register with the Environment Agency Automated Flood Warning System. The plan should include evacuation procedures to follow in the event of a flood alert being received that include a designated place of safe refuge. The escape route will be dry given the 6 - 12 hours advance warning of a flood event. In an extreme emergency, safe refuge is available at first floor level in the development.

4.8 Ground conditions are suitable for the infiltration of surface water run-off. Roof areas will drain to soakaways with private roads and hardstandings constructed in permeable paving. All designs will be for a 1 in 100 year storm plus a 30% allowance for climate change.

4.9 Adoptable road drainage will be positively discharged direct to the public sewer. The proposals will result in a 78% reduction in discharge to the public sewer when compared to the present situation.

Environment Agency

Mrs M Pieterman
Great Yarmouth Borough Council
Planning Department
Town Hall
Great Yarmouth
Norfolk
NR30 2QF

Our ref: AE/2013/116681/01-L01
Your ref: 06/13/0472/O

Date: 30 September 2013

Dear Mrs Pieterman,

DEMOLITION OF TWO EXISTING BUILDINGS (CRANBROOK CENTRE AND TUG STORE) AND RESIDENTIAL DEVELOPMENT OF UP TO 79 UNITS, INCLUDING CONVERSION OF THE SILVERWOOD CENTRE, ASSOCIATED HIGHWAY WORKS NORTHGATE HOSPITAL.
NORTHGATE STREET, GREAT YARMOUTH, NR30 1BU.

Thank you for consulting us on this application which we received on 16 September 2013. We have reviewed the submitted information and are not raising an objection but have provided information on flood risk which you must consider before determining the application. We have also recommended conditions regarding surface water and the potential contamination of the site to ensure the water environment is adequately protected should permission be granted.

Flood Risk
This application site is shown by our Flood Map to lie within Flood Zone 3, defined in Table 1 of the Technical Guidance document supporting the National Planning Policy Framework (NPPF) as the high probability zone. The application proposes the erection of 79 residential units which is considered by Table 2 of this document to be a *more vulnerable* land use. The NPPF considers development of this nature should only be permitted if it passes the Sequential and Exception Test.

Sequential Test
No evidence has been submitted to demonstrate you have considered the Sequential Test. This is your responsibility and should be completed before the application is determined.

Exception Test
If the Sequential Test has been deemed passed, the Exception Test is required. The first part of the Test requires you to be satisfied that the development offers wider sustainability benefits which outweigh flood risk. Again this is your responsibility and

should be completed before the application is determined.

The second part of the Exception Test requires the submission of a Flood Risk Assessment (FRA) which demonstrates the development will be safe for its lifetime, without increasing flood risk elsewhere, and will reduce the overall flood risk where possible. A FRA prepared by Rossi Long, dated August 2013 and referenced 121310 has been submitted. We are satisfied that the FRA provides you with the information necessary to consider whether the application meets the requirements of the Exception Test. We are therefore not raising an objection provided you confirm you consider the development to be safe for its lifetime.

Given the significant level of flood risk associated with this site we encourage to consider each of the following points:

- the sustainability of the development;
- the ability of the proposed flood resilient construction methods and the proposed Flood Plan (which details the management measures of evacuation and higher refuge) to ensure people will remain safe; and
- the ability of the proposed development to obtain flood insurance.

We have reiterated the key flood risk information from the FRA as an appendix to this letter. Although we are not objecting this must be reviewed in full before you determine the proposal as it contains essential information to inform the Exception Test.

Surface Water
The FRA proposes that the majority of the surface water from the development will drain using infiltration, as required in Part H of the Building Regulations, since infiltration testing in the sandy soils revealed good infiltration rates of at least 0.0000249m/s. The proposal is for roofs to drain to soakaways and private roads and hardstandings to be constructed from permeable paving. They have been sized to contain the 1 in 100 year rainfall event including climate change.

The 2150m² of highways are proposed to drain to Anglian Water sewer as there are difficulties in locating multiple highway sewers 5m from dwellings and the road. Currently 46% of the existing development, an area of 10,288m², drains to Anglian Water sewer so the proposals represent a reduction of 78%. The FRA does not detail whether the runoff into the sewer will be restricted, what the outfall rates will be, or whether any storage will be provided. Anglian Water will need to agree to the proposed discharge of water into their sewers.

The proposed development will be acceptable if a planning condition is included requiring the following drainage details.

Condition
No development shall take place until a surface water drainage scheme for the site, based on sustainable drainage principles and an assessment of the hydrological and hydro geological context of the development, has been submitted to and approved in writing by the local planning authority. The drainage strategy should demonstrate the surface water run-off generated up to and including the 100 years critical storm will not exceed the run-off from the undeveloped site following the corresponding rainfall event. The scheme shall subsequently be implemented in accordance with the approved details before the development is completed.

Cont/d..

The scheme shall also include:

- Confirmation from Anglian Water of the proposed outfall rates from the road network into their surface water sewer in a range of rainfall events from the 1 in 1 year to the 1 in 100 year including climate change, along with details and modelling of any restricted outfalls and storage structures in the range of rainfall events.
- Plans and details of the proposed surface water drainage scheme, along with modelling to demonstrate that they have been designed to store the 1 in 100 year rainfall event including climate change.
- Modelling of the contributing network to demonstrate no above ground flooding in the 1 in 30 year rainfall event. Modelling of the contributing network to determine any volumes of flooding in the 1 in 100 year rainfall event including climate change and details of where the water would flow or be stored to prevent flooding of buildings and offsite flows.
- Details of who will maintain the system for the lifetime of the development, along with a maintenance schedule.

Reason
To prevent the increased risk of flooding, both on and off site.

Groundwater & Contaminated Land
We have reviewed to the "Site Investigation Report", Ref: 121310, 15 August 2013, prepared by Rossi Long Consulting, for the above site.

The report indicates potential sources of contamination have been identified for the site, associated with its previous use as a hospital, including vehicle parking, underground fuel storage tanks & pipe-work, electricity sub-stations and made-ground.

Site inspection has also identified the presence of an underground tank, possibly associated with fuel/oil storage.

The investigation undertaken so far has not identified any gross contamination that would appear to pose a significant risk to controlled waters.

However, the sampling and analyses has included only 3 locations at a shallow depth, which has identified a slightly elevated level of hydrocarbons in the area of the underground storage tank, the investigation thus far has not included all the potential contaminants of concern or the groundwater detected at a shallow depth below ground level, and much of the site is covered by hard-standing.

Following removal of any on-site structures such as buildings, hard-standing, underground tank, etc, further investigation will therefore be required to determine the levels and extent of any contamination present, with any significant contamination detected being fully delineated by further investigation, including the groundwater.

The site is underlain by Superficial Deposits of sand & gravel, designated as Secondary A Aquifer, which in turn overly the Crag Bedrock of sand & gravel, designated as Principal Aquifer, and groundwater has been detected at a shallow depth below the site.

Given the above information we consider that planning permission should only be granted if the following planning conditions are included on the decision notice. Without these conditions the proposed development poses an unacceptable risk to the environment and we would object to the application. We ask to be consulted on the

Cont/d..

details submitted for approval to your Authority to discharge this condition and on any subsequent amendments/alterations

Condition 1
<Prior to each phase of development approved by this planning permission no development / No development approved by this planning permission> (or such other date or stage in development as may be agreed in writing with the Local Planning Authority), shall take place until a scheme that includes the following components to deal with the risks associated with contamination of the site shall each be submitted to and approved, in writing, by the local planning authority:

1) A preliminary risk assessment which has identified:
- all previous uses
- potential contaminants associated with those uses
- a conceptual model of the site indicating sources, pathways and receptors
- potentially unacceptable risks arising from contamination at the site.

2) A site investigation scheme, based on (1) to provide information for a detailed assessment of the risk to all receptors that may be affected, including those off site.
3) The results of the site investigation and detailed risk assessment referred to in (2) and, based on these, an options appraisal and remediation strategy giving full details of the remediation measures required and how they are to be undertaken.

4) A verification plan providing details of the data that will be collected in order to demonstrate that the works set out in the remediation strategy in (3) are complete and identifying any requirements for longer-term monitoring of pollutant linkages, maintenance and arrangements for contingency action.

Any changes to these components require the express written consent of the local planning authority. The scheme shall be implemented as approved.

Advice to LPA
This condition has been recommended as we are satisfied that there are generic remedial options available to deal with the risks to controlled waters posed by contamination at this site. However, further details will be required in order to ensure that risks are appropriately addressed prior to development commencing.

The Local Planning Authority must decide whether to obtain such information prior to determining the application or as a condition of the permission. Should the local planning authority decide to obtain the necessary information under condition we would request that this condition is applied.

Condition 2
No occupation <of any part of the permitted development / of each phase of development> shall take place until a verification report demonstrating completion of works set out in the approved remediation strategy and the effectiveness of the remediation shall be submitted to and approved, in writing, by the local planning authority. The report shall include results of sampling and monitoring carried out in accordance with the approved verification plan to demonstrate that the site remediation criteria have been met. It shall also include any plan (a "long-term monitoring and maintenance plan") for longer-term monitoring of pollutant linkages, maintenance and arrangements for contingency action, as identified in the verification plan. The long-term monitoring and maintenance plan shall be implemented as approved.

Condition 3
No development should take place until a long-term monitoring and maintenance plan in respect of contamination including a timetable of monitoring and submission of reports to the Local Planning Authority, shall be submitted to and approved in writing by the Local Planning Authority. Reports as specified in the approved plan, including details of any necessary contingency action arising from the monitoring, shall be submitted to and approved in writing by the Local Planning Authority. Any necessary contingency measures shall be carried out in accordance with the details in the approved reports. On completion of the monitoring specified in the plan a final report demonstrating that all long-term remediation works have been carried out and confirming that remedial targets have been achieved shall be submitted to and approved in writing by the Local Planning Authority.

Condition 4
If, during development, contamination not previously identified is found to be present at the site then no further development (unless otherwise agreed in writing with the local planning authority) shall be carried out until the developer has submitted a remediation strategy to the local planning authority detailing how this unsuspected contamination shall be dealt with and obtained written approval from the local planning authority. The remediation strategy shall be implemented as approved.

Reason (for all 4 conditions)
To protect and prevent the pollution of controlled waters (particularly groundwater associated with the underlying Secondary and Principal Aquifers, from potential pollutants associated with current and previous land uses as identified in submitted documents) in line with National Planning Policy Framework (NPPF; paragraphs 109 and 121), EU Water Framework Directive, Anglian River Basin Management Plan and Environment Agency Groundwater protection: Principles and practice (GP3:2013) position statements.

National Planning Policy Framework (NPPF) paragraph 109 states that the planning system should contribute to and enhance the natural and local environment by preventing both new and existing development from contributing to or being put at unacceptable risk from, or being adversely affected by unacceptable levels of water pollution. Government policy also states that planning policies and decisions should also ensure that adequate site investigation information, prepared by a competent person, is presented (NPPF, paragraph 121).

Advice to applicant
We recommend developers should:

- Follow the risk management framework provided in CLR11, Model Procedures for the Management of Land Contamination, when dealing with land affected by contamination.
- Refer to the Environment Agency Guiding principles for land contamination for the type of information that we required in order to assess risks to controlled waters from the site. The Local Authority can advise on risk to other receptors, such as human health.
- Refer to our website at www.environment-agency.gov.uk for more information

Surface water management advice to applicant:
Where soakaways or other infiltration systems are proposed for the disposal of surface water, our general requirements are:

- Soakaways or other infiltration systems shall only be used in areas on site where they will not present a risk to groundwater, with the depth of soakaway kept to a minimum to ensure that the maximum possible depth of unsaturated material remains between the base of the soakaway and the top of the water table, ensuring that a direct discharge of surface water into groundwater is prevented.
- Soakaways shall not be constructed in land affected by contamination, where they may promote the mobilisation of contaminants and give rise to contamination of groundwater.
- Only clean water from roofs shall be directly discharged to soakaway.
- Systems for the discharge of surface water from associated hard-standing, roads and impermeable vehicle parking areas shall incorporate appropriate pollution prevention measures.

We trust this information is helpful.

Yours sincerely,

Ms Louisa Johnson
Sustainable Places - Planning Advisor

Direct dial 01473 706007
Direct e-mail louisa.johnson@environment-agency.gov.uk

cc Ingleton Wood

Technical Appendix – Flood Risk

This information will assist you in determining if the application meets the second part of the Exception Test.

Flood Risk

The FRA includes both the modelled defended flood levels which ascertain the actual flood risk from overtopping of the defences and the undefended flood levels which depict the worst case flood risk in the event of a breach.

Although the site is protected by flood defences it is still at risk of flooding from overtopping. The FRA advises that the site is not at risk of flooding in present day flood events but is at actual risk of flooding through overtopping of the flood defences in all flood events as frequent as a 0.5% (1 in 200 year) annual probability flood at the end of the development lifetime.

The table below identifies the peak flood levels at the site in a range of overtopping flood events both now and in the future when the impacts of climate change are considered.

Overtopping flood event	Current peak flood levels	Future peak flood levels
1 in 20 year event	No flooding	No flooding
1 in 200 year event	No flooding	2.30mAOD
1 in 1000 year event	No flooding	3.10mAOD

Overtopping Flood Depths at the Site

Table 3 of the FRA details the anticipated overtopping flood depths on site based on site levels of 1.58mAOD to 2.75mAOD. The table below summarises this information and the *danger for people* classification as set out in Table 13.1 of R&D document FD2320.

	Flood depth on site	*Danger for people* classification
1 in 200 year climate change event	0m to 0.72m	*'very low hazard to danger for most including the general public'*
1 in 1000 year climate change event	0.35m to 1.52m	*'danger for some' to 'danger for most including the general public'* at low flow velocities

Overtopping Flood depths in the building

The FRA advises that the floor levels of the proposed dwellings will be set at 2.30mAOD. Based on this figure the below table summarises the anticipated depth of flooding within the building in a range of overtopping flood events.

Overtopping flood event	Flood depth within the building
1 in 200 year event (with climate change)	0m
1 in 1000 year event (with climate change)	0.8m

Cont/d..

Breach flood levels and depths

In the event of a breach in the defences, it is likely that these anticipated depths of flooding will be increased. These have been assumed to be the same as the undefended flood levels, to be precautionary, as detailed in Table 4 on page 9 of the FRA, and below.

Breach flood event	Current peak flood levels	Future peak flood levels with climate change
1 in 20 year event	1.91m AOD	2.90mAOD
1 in 200 year event	2.51mAOD	3.26mAOD
1 in 1000 year event	2.90mAOD	3.54mAOD

The flood depths on the site and in the building are detailed below:

Breach flood event	Flood depth within the building	Danger for people classification	Flood depth on the site	Danger for people classification
1 in 20 year event	0m	Very low hazard	0 m – 0.33m	Danger for some
1 in 20 year event (with climate change)	0.6m	Danger for some	0.15 m – 1.32m	Very low hazard to danger for most
1 in 200 year event	0.21m	Very low hazard	0m – 0.93m	Very low hazard to danger for most
1 in 200 year event (with climate change)	0.66m	Danger for all	0.51m – 1.68m	Danger for some to danger for all
1 in 1000 year event	1.3m	Danger for most	0.15 m – 1.32m	Very low hazard to danger for most
1 in 1000 year event (with climate change)	1.24m	Danger for all	0.79m – 1.96m	Danger for most to danger for all

Proposed Mitigation

(i) Physical Measures

PPS 25 Practice Guide paragraph 6.29 states that in areas of high velocity water, buildings should be structurally designed to withstand the expected water pressures, potential debris impacts and erosion which may occur during a flood event. To assess whether the proposed building is adequately designed, an assessment into the hydrostatic and hydrodynamic pressures acting upon the building following a breach or overtopping of the defences should be made along with an assessment of the breach on the scour of the foundations. Ideally this assessment should be included as part of the FRA, but if required you could condition that details of this analysis is provided to demonstrate that the development would remain standing during a 0.5% (1 in 200 year) annual probability flood event including climate change.

Cont/d..

The FRA has partly considered this requirement advising that a water exclusion strategy adopted up to a level of 2.6mAOD, so flood boards will be provided.

Above this level a 'water entry strategy' will be adopted to reduce the hydrostatic pressures caused by the differential depth of water between the peak flood levels and the ground floor level. The ground floor of the buildings will therefore be designed to flood. It is usually considered that prevention of internal flooding of a building is more important for dwellings because dwellings are likely to contain personal possessions and cannot be closed down during a flood event like other development types.

The FRA proposes that to minimise damage Flood Resilient Construction measures will be incorporated to the 1 in 1000 year overtopping flood level of 3.1mAOD. The draft National Planning Practice Guidance states that the use of flood resilient construction measures could help properties in low or residual flood risk areas, but should not be used to justify development in inappropriate locations. The proposed *more vulnerable* dwellings are in a high flood risk area so could be considered to be in an inappropriate location for the use of such measures.

Chapter 6 of the PPS 25 Practice Guide sets out a Flood Risk Management Hierarchy. Step four includes the raising of floor levels and modification of ground levels as possible options to manage flood risk to new developments. We suggest you should be satisfied that these options have been considered and are not appropriate in this instance before determining if the flood resilience measures suggested in the FRA are appropriate.

If flood resilient measures are to be implemented then it should be in accordance with the Communities and Local Government document '*Improving the Flood Performance of New Buildings: Flood Resilient Construction*': http://www.planningportal.gov.uk/uploads/br/flood_performance.pdf. We cannot offer expertise on the appropriateness of the building design or resilience and resistance measures, however, further guidance may be available from your own building control department.

In relation to the issue of the safety, you need to be sure that you are satisfied that the measures proposed will ensure the safety of the building and its users. You must be satisfied that either the anticipated depth of internal flooding can be mitigated using the resilience measures proposed, or the floors shall be raised above the predicted flood level.

(ii) Flood Management / Emergency Planning

As detailed above, the ground floor of the building would be dry in an overtopping design 1 in 200 year flood event with the addition of climate change and the access routes would be flooded to depths of up to 0.8m. In a breach flood event the flood depths would increase to 0.66m in the building and up to 1.68m on the access routes.

The FRA states that it is therefore important that a Flood Response Plan is developed and that people evacuate on receipt of a flood warning, well in advance of the predicted flood event, and that higher refuge is available should evacuation not take place. A draft Flood Response Plan is in Appendix J of the FRA. The flats will have a communal area at a higher level to act as a refuge.

Paragraph 6.18 of the PPS25 Practice Guide states that, *'safe refuge above flood level should be designed into new developments'*. The decision over the acceptability and quality of any higher level refuge (provision of facilities, communication, warmth etc.), or its absence, rests with you in consultation with other professionals which you may wish to consult on the issue e.g. your Emergency Planning Officers.

Usually it is considered that availability of access is more important in vulnerable development and where flooding occurs frequently, such as in this development, and in dwellings which cannot be closed down during a flood event in the same way as other development types. Therefore you should determine whether the use of prior evacuation is an appropriate and acceptable management action in the event of climate change overtopping flood events and present day and future breach flood events that could flood the buildings and roads to unsafe depths, or whether safe access and a dry building is required.

The FRA states that a Flood Response Plan will be compiled, and a draft is in Appendix J of the FRA, to ensure that the occupants are aware of the flood risk and the procedures to take before, during and after a flood event to keep the occupants safe. You should decide, in liaison with your Emergency Planner and other relevant experts you may wish to consult, whether the issues of safety of access and escape can be overcome via the provision and implementation of the proposed Flood Response Plan. If you consider this appropriate then you should ensure your emergency planner, the emergency services and the Local Resilience Forum to ensure they are satisfied with the management actions set out in the Flood Response Plan in the event of both a warned or unexpected flood event. It is essential that this consultation takes place prior to the granting of planning permission as the agreement and securing of a suitable flood response plan will be crucial for the safety of the development.

It should be noted that a suitable site specific flood plan may reduce the risk to the occupiers of the development, but would not remove it; Section 7.26 of the PPS25 Practice Guide states that new development should not rely on flood warning alone as the only way of managing residual risk. It should be noted that even if a flood warning is successfully issued by us there can be no guarantee that occupants will receive or heed the warning..

Insurance

A guidance note has been issued by the Association of British Insurers (ABI) to complement the NPPF: www.abi.org.uk/information/61595.pdf. It highlights the importance of adequately considering flood risk to ensure that insurance cover can be offered to properties. A 1 in 100 plus climate change minimum standard is suggested, and a preference for flood avoidance (defences or raised floor levels) over flood resistance or resilience measures is stated.

The proposed floor levels are set at the 1 in 200 year climate change overtopping flood level of 2.3mAOD so it is possible that flood insurance would be able to be obtained. There is no freeboard above the flood level to account for inaccuracies or wave action but flood boards will be installed to 2.6mAOD to mitigate this risk.

Therefore in making decisions regarding the safety of new dwellings, we would urge developers and planners to consider the potential insurance implications of a development. We strongly advise that the recommendations of the ABI are taken into account in the design of the development, in order that developments may have a good chance of accessing flood cover at a competitive price. You should ensure that you are satisfied with the sustainability and long-term viability of the proposed development,

which may include determining whether flood insurance would be able to be obtained.

nclusions

If you are not satisfied, taking into account all relevant considerations, that the proposed development can be considered safe without the provision of a safe dry building or safe access and egress then planning permission should be refused. We will support your decision on flood risk matters if you are minded to refuse the application on the grounds that the mitigation proposed is not considered satisfactory.

Alternatively if you consider that the development will be safe and sustainable for the lifetime of the development and are minded to grant permission, then we recommend you condition the finished floor level and flood resilient measures included within the FRA to ensure the appropriate protection to the development and /or occupants. The provision of Flood Response Plan should be conditioned if this is not provided ahead of you determining the application.

End

From
Sent:
To:
Subject: Application 06/13/0472/O

Dear Miss J Smith

With reference to application 06/13/0472/O proposal demolition of two existing buildings and residential development on the location of Northgate Hospital NR30 1BU.

I wish to raise concerns on behalf of myself and other residents in the Beaconsfield Road area.

I am concerned that when the area you are suggesting be totally demolished that there will be extra parking issues on Beaconsfield Road. I along with several others particularly in my block of houses, house disabled residents. I have previously made contact with the council about disabled road markings. I was told this is no longer available. With the small car parking facilities opposite where I live, the council workers and now workmen on the demolition site takeover not only this area of parking but outside residential houses.

I am concerned that once this area along with the car park that disabled people like myself and others will have even more difficulty finding a space to park within a reasonable distance from our own homes.

I have also been told at the local meeting that there will be issues regarding leaving the estate. That the proposal will be to put a mini roundabout to access the new development onto Beaconsfield Road, this will mean the implementation of double yellow lines again outside my area of houses that disabled people reside.

I was told by the people we bought the house from only 6 months ago that they was refused a front drive although it is prepared for one that it fell short of a few centimetres to be able to be used as one. I am concerned that this being the case along with the above complaints that I am going to face even more difficulty in finding a space to park.

I also wish to add that when I brought this house I was not over looked from the front of the property. This again gives me concern that it will affect the privacy & noise levels. I need rest and with already the level of noise from destruction it is leaving me feeling very fatigued. With the new build will bring more noise disruption and more noise from new residency. This will deteriorate my health further.

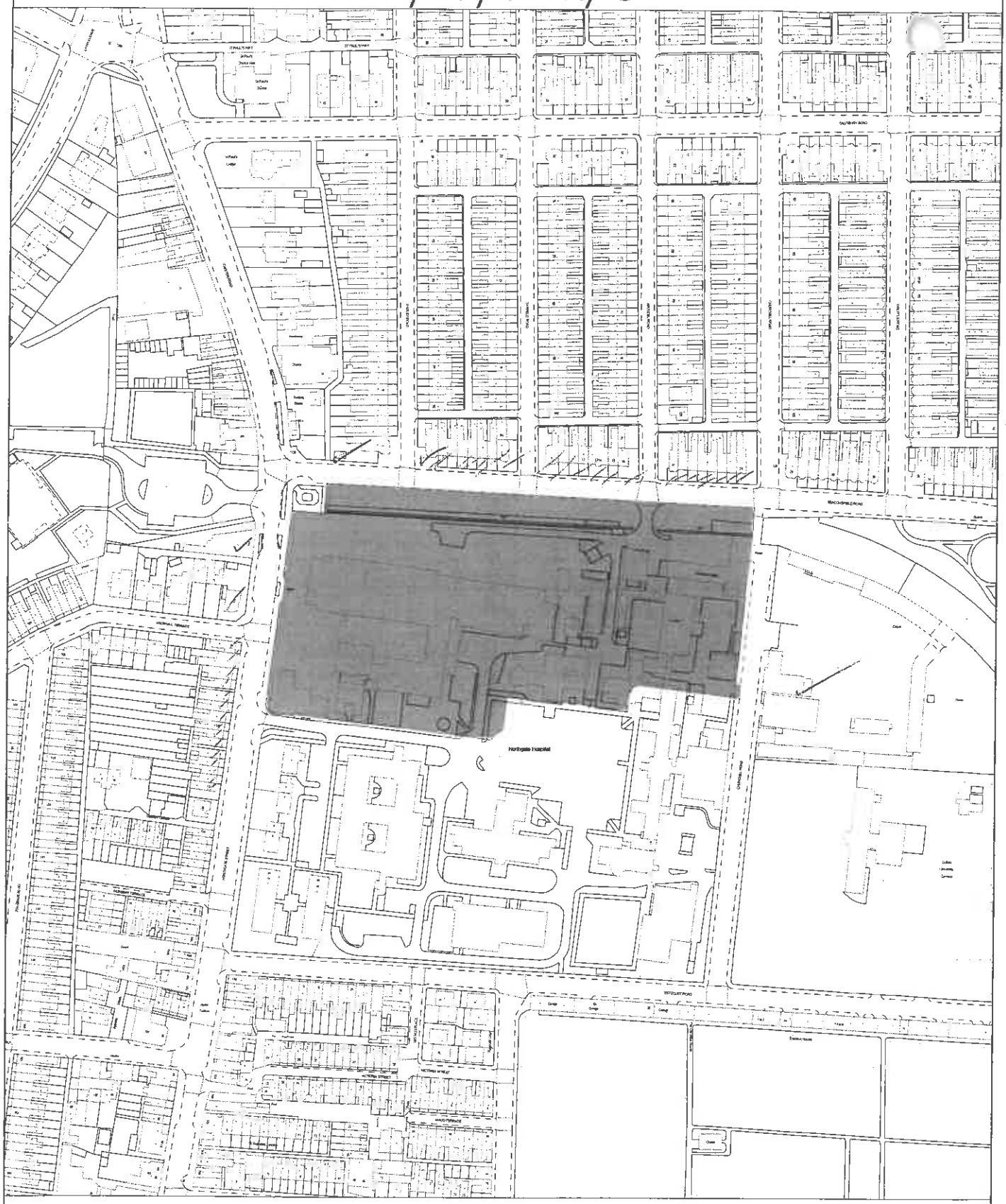
I hope that you can hear and see my concerns and that of other residents. The car parking issues of council workers taking neighbourhood spaces has been raised with a negative response. Please be aware of the impact this will have on the disabled residents of Beaconsfield Road and surrounding roads.

Yours sincerely
[redacted]
[redacted] Beaconsfield Road
Newtown
Great Yarmouth
[redacted]

Sent from Samsung Mobile

SITE NOTICE

06/13/0472/O



GREAT YARMOUTH
BOROUGH COUNCIL

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Metres

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S

Scale = 1:2500 @ A4

Planning and Business Services,
Town Hall, Great Yarmouth,
Norfolk. NR30 2QF