

HERITAGE, DESIGN, ACCESS & PLANNING STATEMENT ANCIENT MARINER 59 WEST STREET BOGNOR REGIS



W haleback Planning & Design
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Site	Ancient Mariner, 59 West Street, Bognor Regis PO21 1XB
Project	Change of use from single dwelling (C3) to 6 self-contained flats (C3) and a 10-bedroom co-living housing unit (Sui Generis).
Applicant	Ancient Mariner 59 West Street Ltd.
Our Ref	W 2206-a
Date	October 2021
Version	20211022

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Introduction

1. W haleback Planning & Design is instructed by the applicant to prepare and submit an application for planning permission for the change of use of 59 W est Street Bognor Regis, from its current lawful use as a single dwelling (confirmed under previous LDC), to 6 self-contained flats (C3) and a 10-bedroom co-living housing unit (Sui Generis).
2. A pre-application enquiry (PAA/119/21/) was submitted on the 3rd of September, this enquiry included a request for a meeting with the Case Officer and Heritage Officer. A request was made by email on the 24th of September to arrange said meeting but no response to this email has been received to date, at this stage 7 weeks after the pre-application enquiry was submitted. In the absence of any communications from the LPA, the applicant is now proceeding to a planning application to avoid further delays and progress the development proposal. As no discussions have taken place at pre-application stage (despite the submission of an enquiry) it is hoped that discussions will take place during the application process should any concerns arise.
3. This Planning Statement describes the application site and its surroundings, the development proposal, the planning history of the site and the relevant planning policy framework. A planning appraisal is provided to consider the merits of the application followed by a conclusion.

Site and Surroundings

4. The application site is located on the eastern corner of the junction of W est Street and T he Esplanade, on the seafront of Bognor Regis. T he property lies within T he Steyne Conservation Area. T he building historically operated as a hotel, but in recent times converted to a single dwelling use, as confirmed under application BR/42/16/C LE.



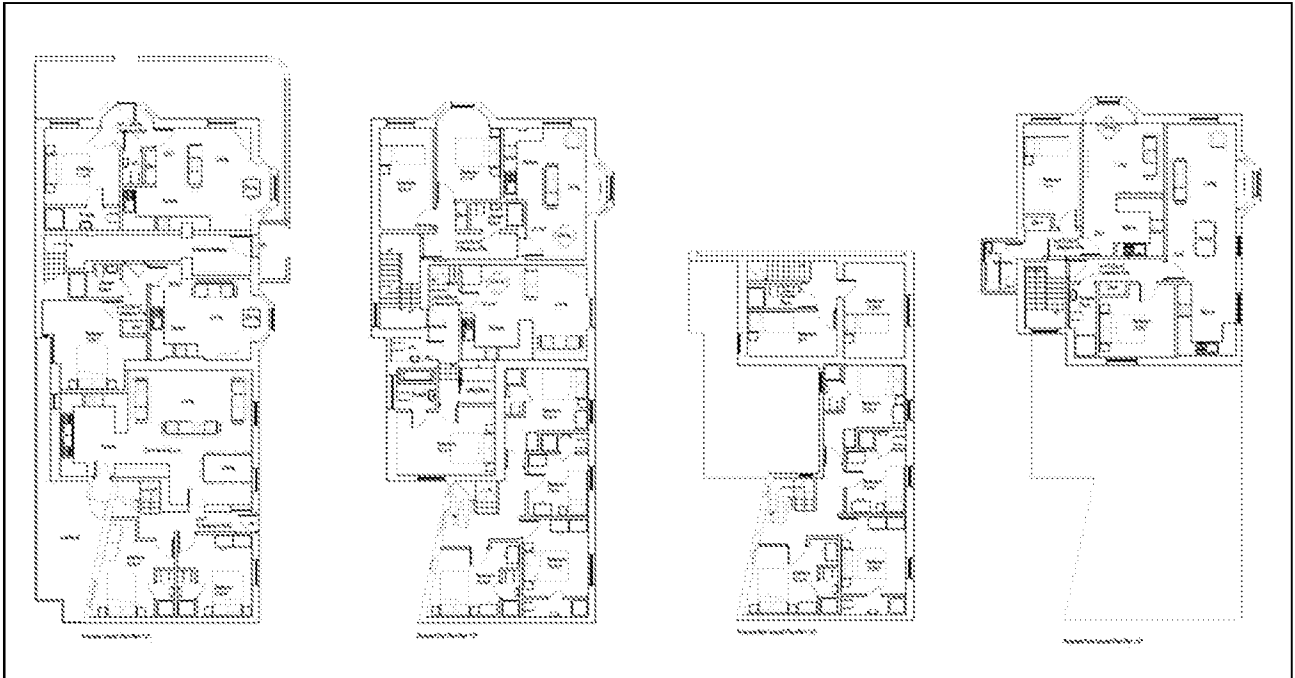
Front (southern) elevation.



Side (western) elevation.

Development Proposal

6. The proposed development is the change of use of the property, from its current lawful use as a single dwelling (confirmed under previous LDC), to 6 self-contained flats (C3) and a 10-bedroom co-living housing unit (Sui Generis). External works largely comprise a wholesale repair and restoration of the building, along with the insertion of three new windows to eastern side of the front elevation, to match the three existing windows on the western side of the front elevation.
7. The proposed flats comprise 2x 1-bedroom flats at ground floor, a 2-bedroom flat at first floor, a 3-bedroom flat at first / second floor, and 2x 1-bedroom flats to the main front building at second floor. The proposed co-living housing unit is located in the rear wing of the property, comprising a communal living / dining / kitchen space and 2x en-suite bedrooms at ground floor, 4x en-suite bedrooms at first floor, and 4x en-suite bedrooms at second floor. The rear courtyard would provide a small outdoor space for the co-living housing unit which could provide some space for outdoor clothes drying for example.



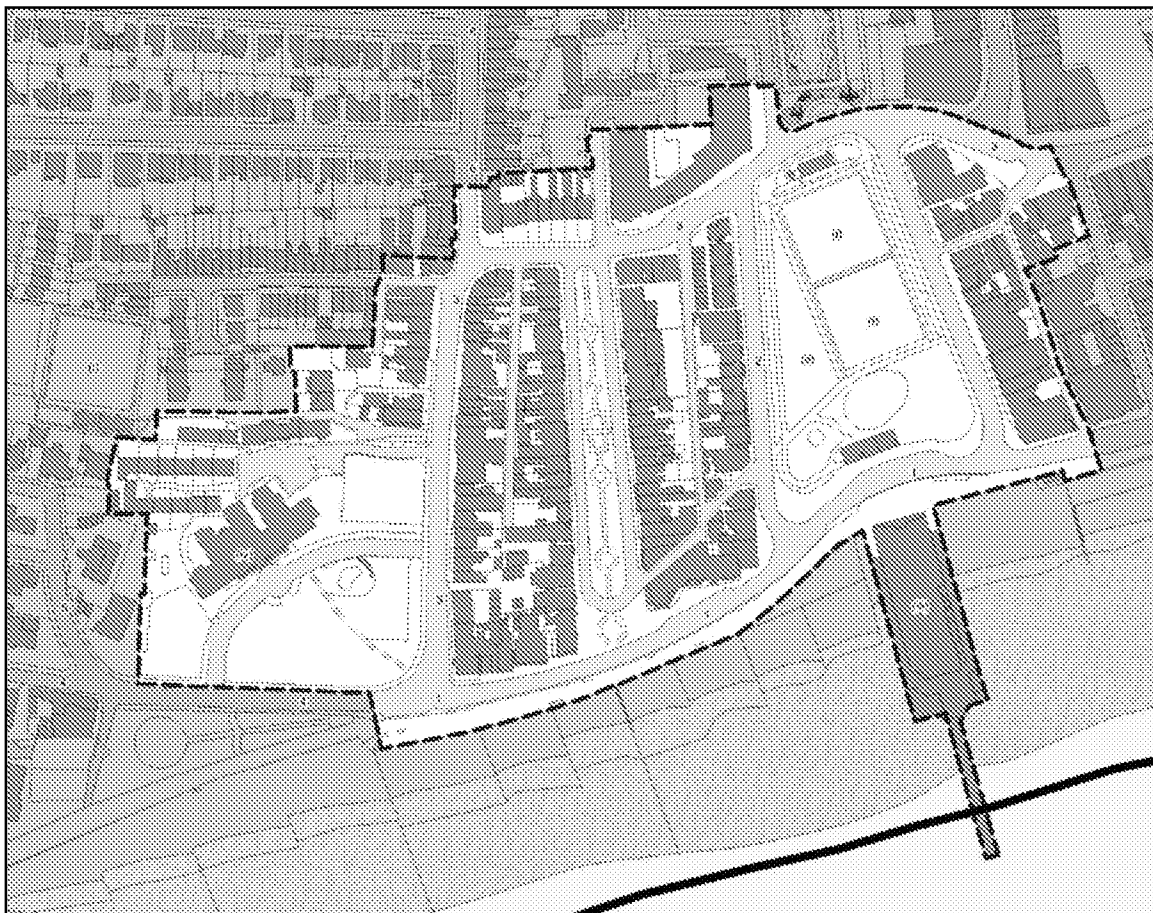
Proposed floorplans.



Proposed front elevation.

Heritage Statement

8. 59 West Street is an unlisted property situated within The Steyne Conservation Area.



The Steyne Conservation Area map extract (ADC)

9. From the Conservation Area Character Statement:

The Steyne is situated on the seafront just west of the town centre. The area around The Steyne was designated a Conservation Area in August 1979 and this was extended in July 1994 to include Waterloo Square.

Dating from the 1820's, The Steyne is an area of modest terraces, imitative in style of the earlier resorts and with a jostling vitality quite different in character from the formal buildings of Sir Richard Hotham's resort about a mile away and the brashness of the modern seaside activities nearby. The Steyne is an open ended rectangle at right angles to the sea, lined with two and three storey terraced houses with bay windows and balconies. To the east of The Steyne, terraces of a similar type form the western edge of Waterloo Gardens. To the west stands the imposing Royal Norfolk Hotel, dating from the 1840's, which is set back diagonally across the corner of Aldwick Road and West Street.

Waterloo Square developed around a space, intended to protect views from Richard Hotham's Fitzleet House. It therefore represents an historically important space in the growth of Bognor Regis as a resort. As an inland, landscaped space, fronting the seafront, it complements The Steyne, and the Pier forms a strong focal point at the southern end. Typical of such seaside resorts' open spaces, the central space is flanked by nearly continuous, street fronted, development. There is a variety in age, style and size of buildings. Remnants from the early development of the Square exist in Nos. 7-17 Waterloo Square, a fine, formal group of buildings in a Regency style dating to 1815 - 1820. The Beach Hotel (four storeys in height and dating to the mid-19th Century), acts as an important focal point at the south eastern corner of the Square, as does the large Bognor Regis Methodist Church at the northern end. Norfolk Street and Little High Street are typical of the several small service streets or roads in the area and their scale contrasts with the large, formal space of the main square. Within the Conservation Area there are some brick buildings but the predominant material is stucco. Chimneys are important features on the skyline.' (ADC, 2000).

10. The application property is in a prominent location on the corner of West Street and The Esplanade. The building and in particular the front main building, is of an attractive and traditional character. It is proposed to repair and restore the exterior of the building to return it to its former glory, a significant heritage benefit. The property has been lacking a viable use to facilitate these works for a number of years, the proposed residential use will instate a long-term viable use which will ensure the building's ongoing maintenance and preservation.
11. External changes are proposed in the form of three new windows to the front elevation. This part of the building is somewhat blank, it is intended that the new windows would improve the appearance of the building and would provide valuable light and outlook to the proposed residential units. The windows proposed are timber sliding sash windows which would be designed and details to match the three windows in situ to the western side of the southern elevation.
12. Overall, the proposed development would deliver significant heritage benefits, and no heritage harm would be caused.

Relevant Planning History

13. BR/42/16/CLE - Lawful development certificate for an existing use as private dwelling ' approved 25/04/2016. This application confirmed the lawful use of the property as a single dwelling, following the previous / historic use of the property as a hotel.

Planning Policy Framework

14. Planning and Compulsory Purchase Act 2004 Section 38(6) requires local planning authorities to determine planning applications in accordance with the development plan, unless other material considerations indicate otherwise.
15. The Development Plan currently in force across the area relevant to the application site currently consists of the following adopted plans:

National Planning Policy Framework

16. A presumption in favour of sustainable development is found at the heart of the NPPF, for both plan-making and decision-taking defined as meeting the needs of the present without compromising the ability of future generations to meet their own needs.
17. Achieving sustainable development means that the planning system has three overarching objectives, which are interdependent and need to be pursued in mutually supportive ways (so that opportunities can be taken to secure net gains across each of the different objectives): economic, social and environment.
18. For decision-taking this means approving applications that accord with up-to-date policies without delay; or where policies are absent, silent or out-of-date, granting permission unless the Framework provides clear reasons for refusing a proposal in a particular location or any adverse impacts of permission would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole.

Arun Local Plan (2018)

19. Policies of the Arun Local Plan relevant to the application proposal are as follows:

- ¿ Policy SD SP1 Sustainable Development
- ¿ Policy RET DM1 Hierarchy of Town Centres
- ¿ Policy RET DM1 Retail Development
- ¿ Policy H SP1 The Housing Requirement
- ¿ Policy H DM1 Housing Mix
- ¿ Policy H SP4 Houses in Multiple Occupation
- ¿ Policy D SP1 Design
- ¿ Policy D DM1 Aspects of Form and Design Quality
- ¿ Policy D DM2 Internal Space Standards

- ¿ Policy D DM4 Extensions and Alterations to Existing Buildings
- ¿ Policy ECC SP1 Adapting to Climate Change
- ¿ Policy ECC SP2 Energy and Climate Change Mitigation
- ¿ Policy T SP1 Transport and Development
- ¿ Policy T DM1 Sustainable Transport and Public Rights of Way
- ¿ Policy W DM2 Flood Risk
- ¿ Policy W DM3 Sustainable Urban Drainage Systems
- ¿ Policy HER SP1 The Historic Environment
- ¿ Policy HER DM3 Conservation Areas

Supplementary Planning Documents

- ¿ Parking Standards Supplementary Planning Document (2020)

Planning Appraisal

Principle of Development

20. The lawful use of the property is as a single dwelling house. The application site is previously developed / brownfield land. Therefore, the principle of intensifying the residential use of the site is acceptable as the site is currently underused. The proposed self-contained flats are a suitable housing type for a central location. The 6 residential units proposed comprise 4x 1-bedroom units, 1x 2-bedroom unit and 1x 3-bedroom unit. All of the proposed units would provide a high standard of accommodation, good room sizes and circulation space, and a high standard of natural light and outlook to all habitable rooms.
21. The proposed 10-bedroom co-living housing unit (Sui Generis) would operate in the fashion of a House in Multiple Occupation - however a high standard of accommodation is proposed with a large high specification communal room, and all bedrooms having en-suite bedrooms. The accommodation would be marketed to young professionals, providing a more affordable type of accommodation than a self-contained flat, and facilitating a communal style of living which many young people prefer to living alone in a studio flat or bedsit. The small rear courtyard is not intended as an amenity area but could provide some space for recycling and refuse storage, outdoor clothes drying etc. The proposed co-living housing unit would not adversely affect the character of the area and would not erode the balance between different types of housing.
22. Overall, it is intended that with a mix of flat sizes plus a co-living unit, the development would provide a range of accommodation types to contribute towards meeting the housing needs of the local area. The application property is extremely well sited, with sea views and immediate access to the recreational space and facilities which the seafront provides. The town centre and its amenities are also in close proximity, along with bus routes and Bognor Regis Railway Station.

23. The principle of the proposed development is acceptable in accordance with Policies SD SP1, H SP1, H DM1 and H SP4.

Housing Mix / Standard of accommodation

24. The 6 residential units proposed comprise 4x 1-bedroom units, 1x 2-bedroom unit and 1x 3-bedroom unit. All of the proposed units would provide a high standard of accommodation, good room sizes and circulation space, and a high standard of natural light and outlook to all habitable rooms. As a conversion of an existing building, the layouts and sizes of the flats are inevitably constrained to some extent by the dimensions and layout of the existing building every effort has been taken to make best use of the space and provide a high standard of accommodation to future occupants. The three new front windows proposed would provide a high standard of light and outlook (sea views) to three proposed bedrooms.
25. The proposed co-living housing unit is centred around a large ground floor communal kitchen / dining / living space, where occupants would cook, dine, relax and socialise. The proposed bedrooms are all en-suite providing private bathroom facilities for every occupant. The small rear courtyard is not intended as an amenity area but could provide some space for recycling and refuse storage, outdoor clothes drying etc.
26. The property as a whole would be finished to a very high specification, providing a pleasant standard of living and a more communal lifestyle which many people prefer to living alone, e.g., in a studio flat. A co-living housing solution provides a more sociable and more affordable option in comparison to self-contained accommodation, and provides a much higher standard of accommodation than a standard bedsit or HMO.
27. Therefore, co-living housing can make a very valuable contribution to the housing mix / stock in the centre of Bognor Regis, meeting an emerging need which other housing types do not fully address. The accommodation would be marketed to young professionals, providing a more affordable type of accommodation than a self-contained flat, and facilitating a communal style of living which many young people prefer to living alone in a studio flat or bedsit.
28. Overall, the proposed mix of housing would make a valuable contribution to the needs of the immediate area, in full accordance with Policies SD SP1, H SP1, H DM1 and H SP4.

Neighbouring amenity

29. The proposed residential use of the building would sit comfortably alongside neighbouring residential uses. The proposed use would be less intensive than the historic use of the property as a hotel, with reduced comings and goings and a reduced number of occupants. The proposed co-living accommodation would be marketed to young professionals and would be appropriately managed; a management plan can be secured by planning condition. For example, an out of hours contact number would be provided to neighbouring residents who could contact the management company of the building for immediate resolution of any concerns. Future occupants would be fully educated as to the need to live as responsible and considerate neighbours and minimise noise disturbance, keep all refuse and recycling tidily stored etc. Overall, the proposed development would result in an appropriate impact upon neighbouring properties.

Visual and Heritage Impact

30. The proposed development would see the exterior of the property fully restored and repaired, and the instatement of a viable long-term use would ensure the ongoing maintenance and preservation of the building. These factors represent significant heritage benefits which attract due weight in the overall Planning balance assessment of the scheme. It is proposed that three new windows be inserted to the front elevation of the building. This part of the building is somewhat blank, it is intended that the new windows would improve the appearance of the building and would provide valuable light and outlook to the proposed residential units. The windows proposed are timber sliding sash windows which would be designed and detailed to match the three windows in situ to the western side of the southern elevation.
31. As set out at pre-application stage, the applicant is open to discussions as to any input the LPA may have into the scheme of repair and restoration works which is proposed.
32. Overall, it is contended that the development would have a very positive impact in heritage terms, in full accordance with Policies HER SP1 and HER DM3.

Transport

33. In regard to transport and parking, the central location of the site means that future residents would not be reliant on private motor vehicle ownership and could instead utilise sustainable transport modes such as walking, cycling and public transport. Should future residents choose to own a private vehicle, the site is located within a controlled parking zone which would manage any additional parking demand which results to ensure that no amenity harm or highway safety risk would result.
34. There is little outdoor space within the site suitable for cycle storage; some cycle storage or rails could be proposed to the front curtilage if it is deemed that this would result in an appropriate appearance, or the applicant would be happy to contribute towards the installation of public railings on the pavement if appropriate.
35. Overall, the proposed scheme, in a central location with a controlled parking zone in place, would result in an appropriate transport impact in accordance with Policies T SP1 and T DM1.

Environmental Sustainability and Renewable Energy

36. The existing building has not undergone a substantial restoration for a number of years. Therefore, the efficiency of the building in respect of thermal insulation, energy and water efficiency will be very poor by modern standards. The proposed conversion of the building to residential use will be specified to deliver full compliance with current building control standards which include a very high standard of thermal insulation, energy and water efficiency. These improvements represent a significant sustainability upgrade, delivering the objectives of Policies ECC SP1 and SP2, which should be given due weight in the overall Planning balance assessment of the scheme.

Flooding and drainage

37. In regard to flood risk, a FRA (Appendix A) has been prepared and submitted which demonstrates that the site is not at high risk of flooding. Surface water drainage attenuation is proposed in the form of rainwater harvesting, attenuation storage and oversized pipes / gutters. These measures can be secured

by planning condition. The proposed development would therefore accord with Policies W DM2 and W DM3.

Conclusion

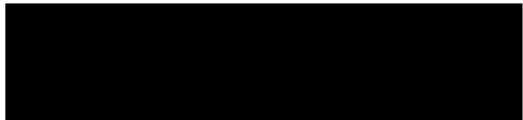
38. The application property as a centrally located brownfield site, is suitable for the intensification of the existing residential use. The proposed self-contained flats and co-living housing unit would make a valuable contribution to the housing stock of the town centre. The proposed wholesale external repair and restoration of the building would deliver a substantial heritage benefit, and the enactment of a viable long-term use of the building would ensure the ongoing maintenance and preservation of the building. The proposed new windows are sensitively designed to be in keeping with the character of the existing building. No harm to neighbouring amenity would result and the development would have an appropriate transport impact. The issues of flood risk and drainage are fully addressed in Appendix A.
39. Considering the three strands of sustainable development (economic, environmental and social), the proposed development addresses all three. During the construction phase, the proposed development would deliver economic benefits through the employment of local trades and custom to local businesses. Once completed, the development would deliver New Homes Bonus and increased council tax income to the Local Authority. Future occupants would patronise local business and would utilise local facilities and amenities improving their viability. In environmental terms, the wholesale refurbishment and conversion of the interior, to current Building Control standards, would deliver significant sustainability benefits through improved thermal insulation, energy and water efficiency. Improved surface water drainage measures would be installed. The delivery of a range of housing types and sizes represents a social benefit.
40. These benefits are substantial, and it is contended that there is no substantial harm which would result from the development, which is fully compliant with national and local planning policies. Therefore, the overall Planning balance is tilted in favour of the development, and it is respectfully requested that planning permission be granted without undue delay.

Engagement with the Local Planning Authority

41. This planning statement has been prepared to assist the Local Planning Authority in the determination of the application with regard to national and local planning policy. However, in the event that the Local Planning Authority should wish to discuss any element of the scheme, including potential amendments, the applicants would welcome a discussion prior to the determination of the application. Correspondence can be sent to W haleback Ltd via the contact details set out below.

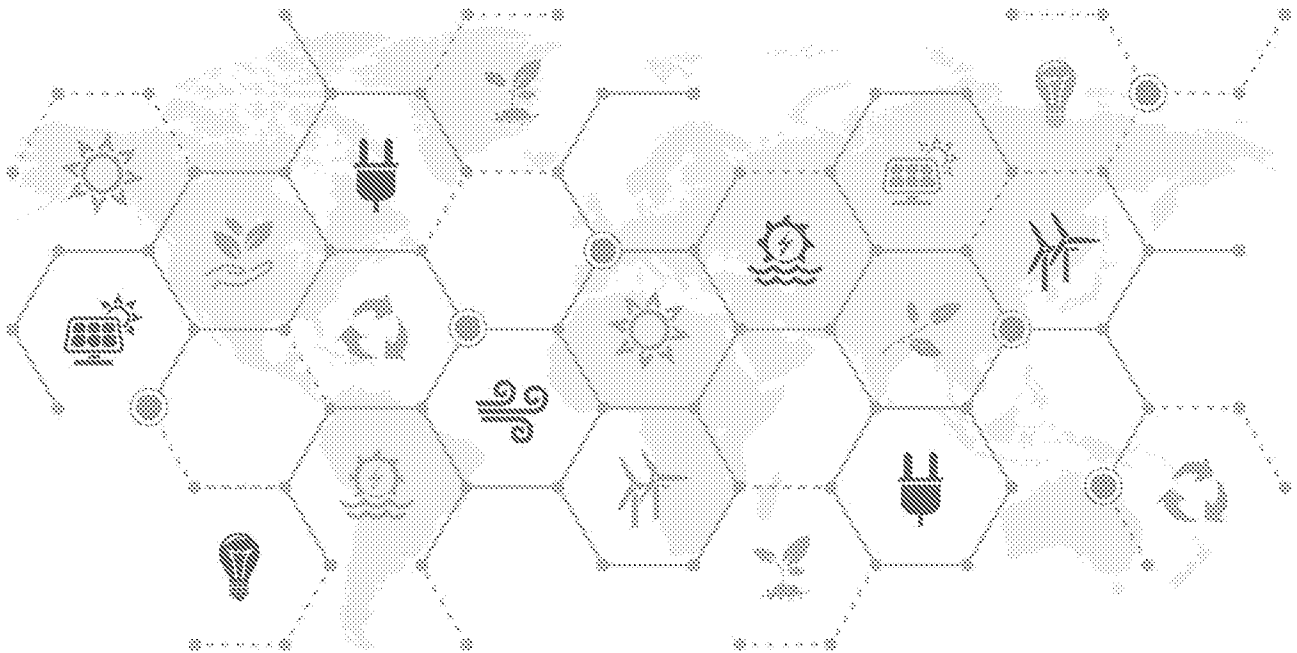
Appendix A: Aval Level 2 Flood Risk Assessment (August 2021)

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Level 2 Flood Risk Assessment

59 West Street, Bognor Regis PO21 1XB
Sussex Property Partnership

August 2021

Project Information

Title	Level 2 Flood Risk Assessment
Job Code	91497
Sector	Flood Risk
Report Type	FRA
Client	Sussex Property Partnership
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Revision	Date	Author	Reviewer	Approver	Status
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B	29 July 2021	PR	PR	AC	Draft
C	02 August 2021	PR	PR	AC	Final

Disclaimer

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1. Executive Summary

Aval Consulting Group Limited has been commissioned by Sussex Property Partnership ('the client') to provide a Flood Risk Assessment in relation to a planning application for the change of use from the existing residential dwelling to self-contained flats at 59 West Street, Bognor Regis, PO21 1XB.

The site is within a Flood Zone 3a and hence, a full Level 2 Flood Risk Assessment has been carried out. Both the Sequential and Exception Tests are not required as the change of use is within the same vulnerability class. An evacuation plan has also been discussed.

The proposed development will also include SuDS such as rainwater harvesting to store the surface water and a hydrobrake is proposed within the drainage pipe system to control the discharge of surface to a maximum discharge rate of 5 l/s due to the high surface water risk.

2. Introduction

2.1 Overview

AVAL Consulting Group Limited (ACL) has been commissioned by the client to produce a Flood Risk Assessment at 59 West Street, Bognor Regis PO21 1XB. This is to accompany the planning application to the Local Authority for consent to undertake the proposed work.

This report will state the Flood Zone the development is located in and demonstrate the proposed development would not require a Sequential and Exception Test. An evacuation plan will also be discussed.

The site drawings are presented in Appendix A.

2.2 Site Location and Details

Figure 1.1 shows the proposed site location. The surroundings of the proposed development are a mix of residential and commercial. The site is bounded by developments to the north and east, The Esplanade Road to the south and the B2166 West Street to the west.



Figure 2.1: Proposed site location (Source: Google Maps)

2.3 Proposed Development and Vulnerability Classification

The proposed development is to convert the existing residential dwelling at 59 West Street into self-contained flats.

The site is located at an approximate height of 6m AOD.



Figure 2.2: Topography of Proposed Site (Source: topographic-map.com)

As per the National Planning Policy Framework, the proposed residential use will be under the **'More Vulnerable'** classification. It is to be noted that the current existing development (single dwelling) is also under the 'More Vulnerable' classification, and the scoping out of Exception Test will be explained in Section 6.2.

3. Relevant Standards and Policies

This section summarises all legislation, policy, statutory and non-statutory guidelines relevant to the proposed development. That also includes all the latest regional and local planning policy guidance specifically applicable to the proposed development.

3.1 The 'National Planning Policy Framework (NPPF)

The National Planning Policy Framework (NPPF) was published in England in March 2012 and re-issued in February 2019. The NPPF is supported by technical guidance set out within the Planning Practice Guidance for Flood Risk and Coastal Change, available on the gov.uk website. <https://www.gov.uk/guidance/flood-risk-and-coastal-change>.

One of the key aims of the NPPF is to ensure that flood risk is taken into account at all stages of the planning process to avoid inappropriate development in areas at risk of flooding and to direct development away from areas of highest risk.

It advises that where new development is necessary in areas of higher risk, this should be safe, without increasing flood risk elsewhere, and where possible should reduce flood risk overall.

The NPPF's flood risk advice is all set out in Chapter 14 of the Framework document, meeting the challenge of climate change, flooding and coastal change.

This document has been prepared in accordance with the recommendations and the policies contained within the NPPF 2019 and the associated Planning Practice Guidance 2016.

3.2 Flood and Water Management Act 2010

The Flood and Water Management Act 2010 received Royal Assent on 8th April 2010. This Act provides duties on the Environment Agency, Local Authorities, Developers and other bodies to manage flood risks. The Act has significant planning and design implications for Developers.

It should be noted that these standards and procedures are being reviewed by the respective regulatory bodies and third parties against the requirements imposed by the Flood and Water Management Act 2010. The advice and recommendations provided may change when associated regulations have been issued in order to implement the full scope of the Act.

3.3 Arun District Council Adopted Local Plan 2018

The Arun District Council has a policy regarding Flood Risk within their 2018 Adopted Local Plan. Policy W DM2: Flood Risk states that if the proposed development falls within the identified risk of flooding within the EA Flood Maps and the Strategic Flood Risk Assessment (SFRA), the required criteria to be followed must be met and satisfied in order for the development to go ahead.

3.4 Arun District Council Level 1 and 2 Strategic Flood Risk Assessment

The Strategic Flood Risk Assessment provides maps of flood zones, highlights the requirement and procedure for the Sequential and Exception tests, as well as states any historic flooding which can help in the analysis of a proposed development. This will be used in order to progress through this report.

4. Description of Study Area

The proposed development is located at the edge of a Flood Zone 3a area as per the Environmental Agency's Flood Zone Map. Figure 4.1 shows the proposed development in terms of Flood Zone 3 using ArcGIS layers from the Environmental Agency.

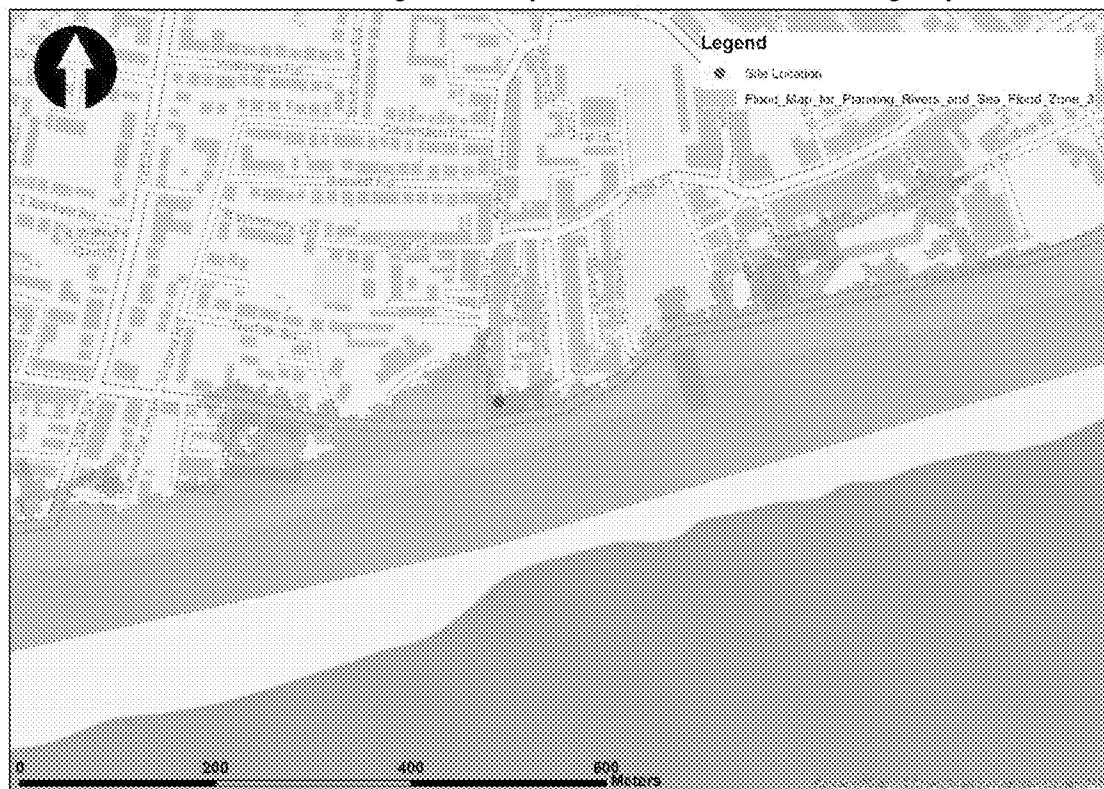


Figure 4.1: Flood Zone Area (Source: ArcGIS Layer from the EA)

In terms of the risk of flooding from Surface Water and the River/Seas, the proposed development is a high risk of surface water and a very low risk of river/sea flooding as shown below.



Figure 4.2: Extent of Flooding from River or the Seas (Source: ArcGIS Layer from the EA)

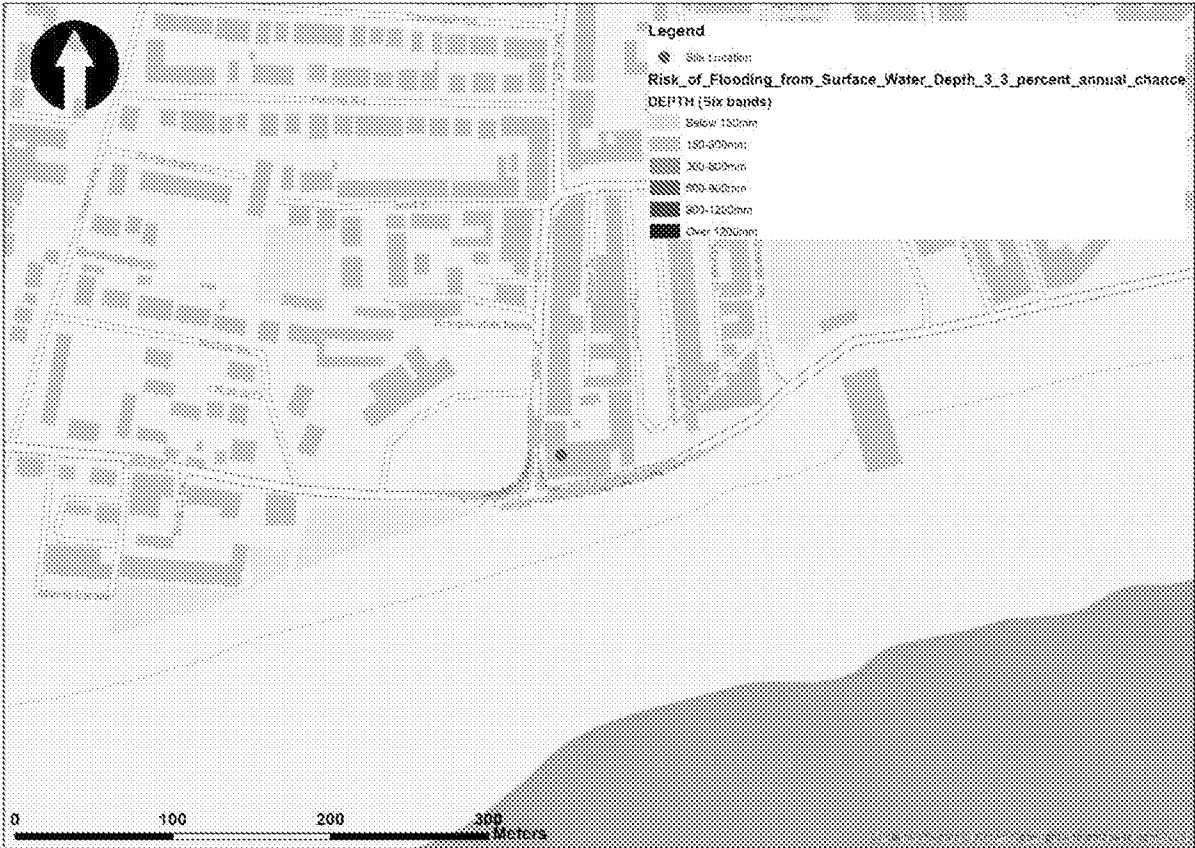


Figure 4.3: Extent of Flooding from Surface Water (Source: ArcGIS Layer from the EA)

The nearest watercourse is the beach beside the proposed development. The nearest river course is 1.55km east of the proposed development as seen below.

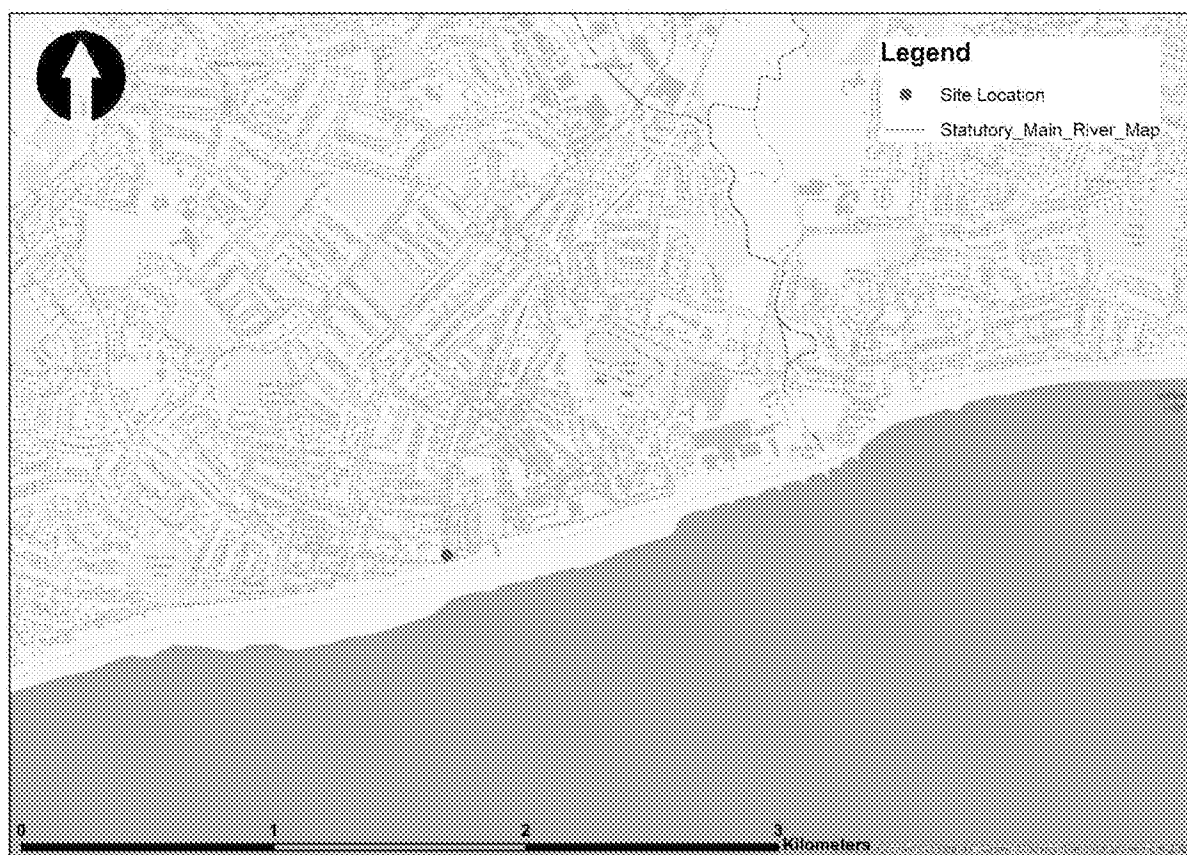


Figure 4.4: EA Watercourses (Source: ArcGIS Layer from the EA)

The proposed development is approximately 6m AOD, with the BGS geology maps indicating bedrock geology of London Clay Formation – Clay, Silt and Sand with superficial bedrock geology of River Terrace Deposits – Sand, Silt and Clay.

The SFRA highlights any historic flood events within the borough. The proposed development has not experienced any flooding previously, including the most recent 2012 flooding.

5. Assessment Of Flood Risk

5.1 Fluvial (River/Sea Flooding) Flood Risk

Information relating to flood risk at the site has been obtained via the Environmental Agency's online flood mapping tool and GIS layer. Figure 4.2 in Section 4 shows the extent of flooding from the river or the seas.

It can be seen that the extent of flooding from the river or the seas is very low risk due to the protection being provided by the coast in the form of high walls just before the proposed development site.

On the basis that the proposed levels are at or above the existing levels, the Fluvial Flood Risk [River Flooding] will remain very low to the development site.

5.2 Pluvial (Surface Water) Flood Risk

Pluvial flooding is defined as flooding resulting from rainfall-generated overland flow before runoff enters any watercourse or sewer.

It is usually associated with high-intensity rainfall events but can also occur with low-intensity rainfall or melting snow where the ground is saturated, frozen, developed or otherwise has low permeability resulting in overland flow and ponding in depressions in the topography. Large catchment areas are particularly prone to this type of flooding.

The Environmental Agency Flood Maps show the site has a high risk of surface water flooding.

The proposed new development will be served by a new surface water drainage network and has been designed to accommodate surface water flows within the site for up to and including the 100 year plus 40% climate change storm event.

5.3 Flooding from Other Sources

Non-natural or artificial sources of flooding can include reservoirs, lakes and canals etc.

No risk of a reservoir or other artificial flooding is identified on the Environment Agency maps. No other potential sources of flood risk have been identified immediately affecting the site.

5.4 Historical and Anecdotal Flooding Information

There has been no recorded historical flooding within or beside the proposed development site, including the most recent 2012 flooding.

5.5 Sequential Test

The Arun District Council's Strategic Flood Risk Assessment, in particular Section 4.3.1 of the SFRA, highlights the procedure to carry out a Sequential Test. As the proposed development only includes the change of use from the existing residential dwelling to self-contained flats, **a Sequential Test does not need to be applied.**

6. Management of Flood Risk

This section will explain how the proposed development will reduce the flood risk within the site and within the surrounding areas of the site.

6.1 Residual Risk

The primary residual risk that would remain at the site would be surface water flooding. As the proposed development only includes the change of use, the current high risk of high surface water flooding will still exist.

In order to reduce surface water flooding within the proposed development, Sustainable Urban Drainage Systems would need to be installed to either safely discharge the surface water or to temporarily store the surface water for future use or discharge. This can be in the form but are not limited to, permeable paving, green roofs or rainwater harvesting.

6.2 Exception Test

The National Planning Policy Framework sets out the different conditions in terms of the vulnerability of the development and the flood zone and accordingly sets out the requirements to do an Exception Test. The table below describes the conditions required for an Exception Test.

Flood risk vulnerability classification (see table 2)		Essential infrastructure	Water compatible	Highly vulnerable	More vulnerable	Less vulnerable
Flood zone (see table 1)	Zone 1	✓	✓	✓	✓	✓
	Zone 2	✓	✓	Exception Test required	✓	✓
	Zone 3a	Exception Test required	✓	×	Exception Test required	✓
	Zone 3b functional floodplain	Exception Test required	✓	×	×	×

Key: ✓ Development is appropriate.
× Development should not be permitted.

However, an Exception test is only required if the vulnerability class is being increased. As both the existing and proposed development fall under the 'More Vulnerable' classification (conversion from a single dwelling to self-contained flats), **an Exception Test is not required.**

6.3 Evacuation Plan

As the proposal is to convert the existing development (single dwelling) into self-contained flats, the existing development would already have defence infrastructure already built in such as a raised Finished Floor Level to prevent any flooding at the base of the development and Flood Doors to prevent the flooding from entering any rooms.

Changes to the self-contained flats can also be made. Electrical wires and connections can travel from the top down. Electrical points for appliances can also be slightly raised in order to avoid contact with water.

As stated in Section 6.1, SuDS can help in reducing the effect of flooding within the site and also upstream of the development site. Storage of surface water for future use or a controlled discharge of surface water can help in the reduction of flooding upstream of the proposed development.

The proposed development site is within the Environmental Agency's Flood Alert System. Residents of the proposed development would be able to sign up to the Alert System and be alerted to any potential flooding ahead of the event.

The evacuation plan would consist of the residents evacuating the proposed development site once the Environmental Agency alert has been received. All residents would need to be aware of the EA's Flood Alert System and sign up to the alerts upon initially using the proposed development. If the most severe warning appears, residents would have to call 999 if in immediate danger.

All Flood Doors need to be fully closed to prevent any water from entering into the development.

Residents would have to then travel north of the proposed development where flooding is less likely to occur. Alternatively, residents can temporarily stay on the highest point of the proposed development (roof) until rescue services arrive

Appendix B includes the warning codes used by the Environmental Agency with further information on required actions. A personal flood plan is also provided for residents to fill in and act upon under any flooding events.

7. Surface Water Management

The National Planning Policy Framework 2019 (NPPF)¹ and accompanying Planning Practice Guidance indicate surface water run-off should be controlled as near to its source as possible through a sustainable drainage approach to surface water management.

Consideration should therefore firstly be given to using sustainable urban drainage (SuDS) techniques including soakaways, infiltration trenches, permeable pavements, grassed swales, ponds and wetlands to reduce flood risk by attenuating the rate and quantity of surface water run-off from a site. This approach can also offer other benefits in terms of promoting groundwater recharge, water quality improvement and amenity enhancements. Approved document Part H of the Building Regulations (2010)² sets out a hierarchy for the disposal of surface water which encourages a SuDS approach, as detailed above.

7.1 Climate Change

There are indications that the climate in the UK is changing significantly and it is widely believed that the nature of climate change will vary greatly by region. Current expert opinion indicates the likelihood that future climate change would produce more frequent short duration and high intensity rainfall events with the addition of more frequent periods of long duration rainfall.

The Environment Agency has highlighted the climate change allowance for all proposed developments as described in Section 7.2

7.2 Small and Urban Catchment Climate Change Growth

The table below highlights the potential climate change expected in the future.

Applies across all of England	Total potential change anticipated for the '2020s' (2015 to 2039)	Total potential change anticipated for the '2050s' (2040 to 2069)	Total potential change anticipated for the '2080s' (2070 to 2115)
Upper end	10%	20%	40%
Central	5%	10%	20%

As this development is for residential use, **a climate change growth factor of 40% is proposed** to be used for the surface water runoff calculations.

7.3 Proposed Restricted Discharge Rates

As the site is a brownfield site with an internal conversion, the proposed surface water discharge rate would need to be restricted to at least half the rate of the existing development rate or better.

Moreover, due to the high risk of surface water flooding just outside of the proposed development it is recommended to further restrict the surface water discharge to a maximum of 5 l/s or less.

Flow control devices such as Hydrobrakes can be used to limit the rate of discharge.

7.4 Methods of Surface Water Management

As set out within the NPPF 2021, there are four methods that have been reviewed for the management and discharge of surface water for the site which are detailed below; these may be applied individually or collectively to form a complete strategy. They should be applied in the order of priority as listed:

- Discharge via infiltration;
- Discharge via watercourse;
- Discharge via public sewerage system;
- Discharged via a combined sewer.

Discharge via Infiltration

The first consideration for the disposal of surface water is infiltration. The site is at high risk of surface water flooding and there is no easement of 5m available from both the proposed development and the neighbouring development.

Therefore, a discharge via infiltration is not possible.

Discharge to a Watercourse

Where infiltration techniques are not considered or not feasible, suitable a connection to a watercourse is the preferred option. The nearest watercourse is not in close proximity to the site, therefore discharge into the watercourse is not a viable option.

Discharge to a Public Sewer

Following the above, the preferred option to discharge surface water is to the existing 450mm diameter Southern Water surface water sewer located outside of the proposed development on West Street. An Asset Search can be found in Appendix C.

8. SuDS Appraisal and Proposed SuDS for Development

8.1 SuDS- General

Whilst the temporary storage volumes will be provided within an oversized pipework, the means by which the surface water is both stored and conveyed to the attenuation system should also incorporate various forms of Sustainable Drainage Systems (SuDS) where possible in accordance with the Environmental Agency's general guidance and the National Planning Policy Framework.

Appropriately designed, constructed and maintained, SuDS are more sustainable than conventional drainage systems. Their benefits in general terms are summarised below.

SuDS can:

- Reduce run-off surface water flow-rates and/or volumes and hence reduce the risk of flooding;
- Encourage natural groundwater re-charge;
- Reduce pollutant concentrations in storm water;
- Provide habitats for wildlife.

8.2 SuDS Appraisal

There are many site-specific factors which will influence the choice of any single or combination of SuDS device used within a development. The primary factors are:

- Whether the development is domestic, commercial or industrial;
- Whether the underlying ground is contaminated. If so, infiltration systems (soakaways) will most probably not be permitted;
- Whether the underlying ground is permeable enough for infiltration systems (soakaways) to be considered;
- Whether the groundwater levels are deep enough for infiltration systems (soakaways) to be considered;
- Whether the site is steeply sloping and its general topography;
- The availability of space inside the development for each potential SuDS facility;

Health and Safety aspects should the development be likely to be inhabited or used by children.

8.3 Types of SuDS with Respect to Proposed Development

As part of the design for this development, SuDS have been incorporated wherever practicably feasible. Based on local and regional policy, where there is a net increase in impermeable area, at least one 'at source' SuDS measure is to be provided to assist with reducing the volume of run-off.

Considering the volume of surface water discharging from the site will be higher than the existing situation, given the increase in impermeable area, a primary SuDS measure is proposed.

The primary SuDS elements proposed for this development are outlined below:

8.3.1 Rainwater Harvesting

This includes installing water butts at the base of the development to temporarily store the water for either future use or for a controlled discharge through the method identified in Section 7.4.

8.3.2 Attenuation Storage

Attenuation storage in the form of crates can be placed underneath the hard surfaces to temporarily store surface water before discharging into the surface water sewer. The amount of storage required can be calculated when designing the drainage network.

8.3.3 Oversized Pipes/Gutters

Slightly oversized pipes can also help in the temporary storage of surface water but can also help in the discharge of surface water from the roof without any major blockages. Gutters can also help take more surface water from the roof into the oversized pipes, thus reducing the pressure on the attenuation storage crates which can then be made smaller.

9. Summary

The development is accessible for emergency access and egress during times of extreme flooding as no flooding is evident on any of the access routes.

The proposed development site is located within Flood Zone 3a, with a very low risk of river/sea flooding and a high risk of surface water flooding.

As per the SFRA, the Sequential test can be scoped out as the proposed development is only a change of use. An Exception Test was also not carried out as the proposed development is within the same vulnerability classification as the existing development.

The proposed development would include SuDS such as rainwater harvesting, attenuation storage and oversized pipes/gutters to limit the flooding both within and upstream of the development. The surface water would be discharged via the ideal method identified in Section 7.4

The development is accessible for emergency access and egress during times of extreme flooding as no flooding is evident on any of the access routes.

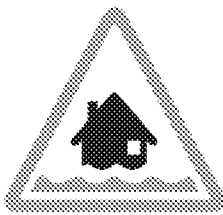
It can therefore be concluded that the proposed development meets the local and national policy.

Appendices

- Appendix A: Existing and Proposed Site Plan
- Appendix B: Warning Codes and Personal Flood Plan
- Appendix C: Southern Water Asset Search

Appendix A: Existing and Proposed Site Plan

Appendix B: Warning Codes and Personal Flood Plan

<u>Flood Alert</u> 	Key Message: Flooding is possible. Be prepared Timing: 2 hours to 2 days in advance of flooding Actions: Be prepared for flooding Prepare a flood kit of essential items Monitor local water levels and flood forecasts <i>Flood Alerts are to warn people of the possibility of flooding and encourage them to be alert, stay vigilant and to make early preparations for flooding.</i>
<u>Flood Warning</u> 	Key Message: Flooding is expected. Immediate Action Required Timing: Half an hour to 1 day in advance of flooding Actions: Act now to protect your property Block doors with flood boards or sandbags and cover airbricks and other ventilation holes Move family, pets and valuables to a safe place Turn off gas, electricity and water supplies if safe to do so Keep a flood kit ready Move cars, pets, food, valuables and important documents to safety <i>Flood Warnings are to warn people flooding is expected and encourage them to take immediate action to protect themselves and their property.</i>
<u>Severe Flood Warning</u> 	Key Message: Severe flooding. Danger to life Timing: When flooding poses a significant threat to life and different actions are required Actions: Stay in a safe place with a means of escape Be ready should you need to evacuate from your home Co-operate with the emergency services Call 999 if you are in immediate danger <i>Severe Flood Warnings are to warn people of a significant risk to life or significant disruption to communities caused by widespread or prolonged flooding, and encourage them to take immediate action to protect themselves and follow the advice of the emergency services.</i>
<u>Warnings no longer in force</u> (no icon)	Key Message: No further flooding is currently expected for your area Timing: When river or sea conditions begin to return to normal Actions: Be Careful. Flood water may still be around for several days and could be contaminated If you've been flooded, ring your insurance company as soon as possible <i>Warnings are removed to inform people that the threat has now passed.</i>

Personal flood plan

Name

Are you signed up to receive flood warnings?

☐

if your area receives free flood warnings.

Let us know when you've completed your flood plan by calling Floodline on **0345 988 1188**.
This will help us learn more about how people are preparing for flooding.

General contact list	Company name	Contact name	Telephone
Floodline	Environment Agency		0345 988 1188
Electricity provider			
Gas provider			
Water company			
Telephone provider			
Insurance company and policy number			
Local council			
Local radio station			
Travel/weather info			

Key locations

Service cut-off	Description of location
Electricity	
Gas	
Water	

Who can help/who can you help?

Relationship	Name	Contact details	How can they/you help?
Relative			
Friend or neighbour			

Be prepared for flooding. Act now

Personal flood plan

What can I do NOW?

Put important documents out of flood risk and protect in polythene ☐

☐

Look at the best way of stopping floodwater entering your property ☐

☐

Find out where you can get sandbags ☐

☐

Identify what you would need to take with you if you had to leave your home ☐

☐

Check your insurance covers you for flooding ☐

☐

Make a flood plan and prepare a flood kit ☐

☐

Identify who can help you/ who you can help ☐

☐

Understand the flood warning codes ☐

☐

What can you do if a flood is expected in your area?

Actions	Location
Home	
● Move furniture and electrical items to safety	
● Put flood boards, polythene and sandbags in place	
● Make a list now of what you can move away from the risk	
● Turn off electricity, water and gas supplies	
● Roll up carpets and rugs	
● Unless you have time to remove them hang curtains over rods	
● Move sentimental items to safety	
● Put important documents in polythene bags and move to safety	
Garden and outside	
● Move your car out of the flood risk area	
● Move any large or loose items or weigh them down	
Business	
● Move important documents, computers and stock	
● Alert staff and request their help	
● Farmers move animals and livestock to safety	
Evacuation - Prepare a flood kit in advance	
● Inform your family or friends that you may need to leave your home	
● Get your flood kit together and include a torch, warm and waterproof clothing, water, food, medication, toys for children and pets, rubber gloves and wellingtons	

There are a range of flood protection products on the market to help you protect your property from flood damage. A directory of these is available from the **National Flood Forum** at www.bluepages.org.uk

Be prepared for flooding. Act now

Appendix C: Southern Water Asset Search

[illegible]