

Sue Head
Folkestone Hythe District Council

Our ref: KT/2024/131321/02-L01
Your ref: 23/1991/FH

Sent by email

Date: 28 March 2024

Dear Sue,

Installation of underground sprinkler tank and associated alterations

Former Rotunda Amusement Park, Shingle Garden, Marine Parade, Folkestone

Thank you for consulting us on the above application, which we received on 11 March 2024.

Environment Agency Position

We have **no objections** to this planning application.

The Local Planning Authority (LPA) should be satisfied that the development cannot be sequentially placed in an area of lower flood risk. If the LPA are minded to approve this development in the current proposed location, we advise the LPA to be satisfied that the development can withstand the hydrostatic pressure it could be placed under during different tidal events. The LPA should also be satisfied that a suitable flood emergency and evacuation plan is in place and that measures have been installed to avoid trespassers within the underground plant rooms.

Note to LPA:

We previously objected to this application (our ref: KT/2024/131321/01-L01; dated: 30th January 2024) stating "In the absence of a flood risk assessment (FRA), we object to this application and recommend that planning permission is refused."

We have reviewed the FRA that has since been submitted (ref: Folkestone Seafront Sprinkler Tank Flood Risk Assessment Report; by: Eckersley O'Callaghan; dated: 6th March 2024). The submitted FRA does not provide any additional information in relation to flood risk. The FRA states "The proposed tank structure is meant to contain and pump water, by virtue of its function, this is considered as a water-compatible structure, as its construction takes into account groundwater and measures to ensure it can function as intended." We do not consider this development to be water compatible and instead would classify it as less vulnerable development based on the National Planning Policy Framework (NPPF) Annex 3 which classifies development types according to their vulnerability to flood risk.

Although the development is situated in Flood Zone 1, it may be subject to hydrostatic pressure, this is confirmed in the submitted FRA which states "The rising tides in this coastal area may subject the buried tank to hydrostatic pressure". We advise following the NPPF sequential approach to the location of the development and recommend that this development should be relocated to a location free from risk of all forms of flooding.

We are unable to comment on the structural integrity of the building and whether the design would be able to withstand the hydrostatic pressure. There is a potential risk to the people accessing and maintaining the below ground plant rooms during a flood event which could cause water ingress and people becoming trapped. Additionally, whilst not in our remit, we would like to highlight concerns over the risk of vandalism to the development and unauthorised access to the hatches in particular from children given the developments proximity to play elements.

Should you wish to discuss these matters further, please contact me via the email below.

Yours sincerely,

Abbie Philpott
Planning Advisor

KSLPLANNING@environment-agency.gov.uk