

Memorandum

To: Spatial Planning	From :	Engineering
c.c	Contact :	David Stewart
c.c.	Ext :	7816
c.c	My Ref :	DS/9/1/3
For the attention of:	Your Ref :	P/2021/0765
Jim Blackwell	Date :	7 th January 2022

Subject: Lymington Road Coach Station, Torquay

Further to the email from Claire Cushion dated 6th January 2022 regarding the above planning application I would like to make the following comments:

1. As identified within the planning application this development lies within Flood Zone 3. All proposed developments within Flood Zone 3 must be accompanied by a site specific flood risk assessment.
2. A site specific flood risk assessment has been submitted in support of this planning application and following a consultation response from the EA objecting to the development further information has been submitted by the developer regarding flow paths and finished floor level for the disabled toilet.
3. I will leave the EA to comment of the flow paths however with regards to the disabled toilet, the developer has now raised the finished floor level to 31.275m, however, this is still below the predicted flood level for the critical 1 in 100year storm event plus 40% for climate change.
4. As the disabled toilet is still at risk of flooding, the developer has proposed flood mitigation measures for the disabled toilet which includes the raising of all electrical equipment at least 1m above finished floor level and a proposal to lock the disabled toilet following receipt of a flood warning from the EA.
5. It must be noted however, that within this area of Torquay the EA do not have a specific flood warning service for main rivers, watercourses and surface water flooding and therefore they will only ever issue a flood alert warning. They do not currently issue a Flood Warning or Severe Flood Warning in Torbay for main river flooding, watercourse flooding or surface water flooding as occurs in this area of Torquay. As a result, it would not be possible to use the EA flood warning service to close and lock the disabled toilets.
6. The developer must investigate an alternative manner in which to close and lock the toilets before a flooding event occurs. It may be possible for the developer to install a local flood warning service based on a depth gauge being located in the vicinity of the toilet that issues a warning should flood water reach say 500mm below the finished floor level of the toilet, allowing the toilet to then be locked.

7. An alternative method of proposing the closure of the toilet would be to use the Met Office flood warning system which is based on rainfall predictions. The toilet could be locked once a flood warning for Torbay has been issued by the Met Office. There are a number of risks associated with this method as sometimes severe storm events, resulting in flooding, occur without a flood warning being issued by the Met Office. Similarly, there is a risk that the toilets may be closed on a regular basis without any flooding occurring. If the developer is considering using this method they would have to consider which level of flood warning (yellow, amber or red) issued by the Met Office is most appropriate to close the toilets.
8. The proposed method of mitigating the flooding must be included in an emergency plan for the disabled toilets. This plan must include the proposed trigger levels and who is responsible for locking the toilets when the trigger level is reached (note this could be at anytime, so the plan has to be operational 24 hours a day).

Based on the information that has been submitted, I would have no objections to planning permission being granted however a planning condition must be included in order that the proposed flood mitigation measures are agreed and in place before the disabled toilet is operational.

Should you have any questions regarding the above please do not hesitate to contact me.