

Havant Borough Council
Development Control
Civic Offices Civic Centre Road
Havant
Hampshire
PO9 2AX

Our ref: HA/2024/126112/01-L01
Your ref: APP/24/00267
Date: 19 August 2024

Dear Planning Officer,

DEMOLITION OF EXISTING SINGLE STOREY GARAGE AND ERECTION OF A TWO BED, TWO STOREY DWELLING. 36 ROWNHAMS ROAD, HAVANT, PO9 4QB

Thank you for consulting the Environment Agency on the above application.

We have reviewed the information as submitted and set out our position below.

Environment Agency Position

In the absence of an acceptable flood risk assessment (FRA) we object to this application and recommend that planning permission is refused.

Reason

The submitted FRA (*FLOOD_RISK_ASSESSMENT-1918574*) dated March 2024) does not comply with the requirements for site-specific flood risk assessments, as set out in paragraphs 20 to 21 of the Flood Risk and Coastal Change planning practice guidance and its site-specific flood risk assessment checklist. The FRA does not therefore adequately assess the flood risks posed by the development. In particular, the FRA fails to:

- take the impacts of climate change into account adequately
 - There is no assessment of the impact of climate change using appropriate climate change allowances for a 1 in 100year fluvial flood event for the lifetime of the development (100 years for residential).
- consider how people will be kept safe from the identified flood hazards

- consider the requirement for flood emergency planning including flood warning and evacuation of people for a range of flooding events up to and including the extreme event
- Flood risk mitigation measures to address flood risk for the lifetime of the development included in the design are inadequate because they will not make the development resilient to the flood levels for a 1 in 100year fluvial flood event for the lifetime of the development (100 years for residential). Consequently, the development proposes inadequate:
 - Raised finished floor levels
 - Resistance and resilience measures
 - Safe access and egress routes

Overcoming our Objection

The change of use from a garage to a habitable dual storey accommodation for 3 people is a significant increase in vulnerability, and therefore the consequence of this development flooding is significantly increased. We request a more thorough assessment of the future flood risk and hazards to the property and its inhabitants. We also recommend that the applicant includes appropriate mitigation measures.

To overcome our objection, the applicant should submit a revised FRA which addresses the points highlighted above.

If this cannot be achieved, we are likely to maintain our objection. Please re-consult us on any revised FRA submitted and we'll respond within 21 days of receiving it.

Product 4 data

In section 4 of the FRA, the applicant has not assessed the future flood risk to the site for a 1 in 100year fluvial flood event for the lifetime of the development (100 years for residential). We recommend that the applicant requests Product 4 data from the Environment Agency, to help determine the future risk to this site.

This FRA requires Product 4 information to indicate future flood levels for flood zones 2 and 3 for this site. Please contact SSDEnquiries@environment-agency.gov.uk (including a site map and grid reference) to obtain a Product 4 for your development. Flood risk data requests will be based on existing EA hydraulic river model data with an allowance for climate change. Data should be taken from the Product 4 to inform the FRA.

Please note, the future flood levels provided in the Product 4 were calculated before the latest climate change allowances were available. Please use the advice within '[Flood risk assessments: climate change allowances](#)' to calculate the most up to date climate change levels. It is for to the applicant to assess and determine which climate change allowance to use, and this should be justified within the assessment. You may need to undertake further assessment of future flood risk using different allowances to ensure your assessment of future flood risk is based on best available evidence.

Climate change allowances

In the submitted FRA, there is no evidence for future fluvial flood levels for a 1 in 100year fluvial flood event (1% AEP) plus climate change for the lifetime of the

development (100 years for residential). We request that the applicant adequately assesses the future flood risk, including climate change allowances for the site.

The applicant fails to identify within their FRA which allowances has been chosen to assess future flood risk and provide a justification. Therefore, the applicant will need to indicate which climate change allowance has been chosen and the justification behind why that allowance has been chosen. [Flood risk assessments: climate change allowances - GOV.UK \(www.gov.uk\)](https://www.gov.uk/guidance/flood-risk-assessments-climate-change-allowances).

Where flood risk data including climate change does not exist, it is the responsibility of developers to undertake this assessment using guidance in '[Flood risk assessments: climate change allowances](https://www.gov.uk/guidance/flood-risk-assessments-climate-change-allowances)'. Assessment of future flood risk can be undertaken using:

- Freeboard allowances
- Interpolation based on current flood risk models
- New detailed modelling

Deciding which approach applies depends on the size, vulnerability and location of the development. It is envisaged that large scale developments (e.g. sustainable urban extensions, retail parks, large commercial developments) will need to adopt the detailed approach. Contact us to discuss this on a case-by-case basis. Please note we may charge for this advice.

Finished Floor Level

The applicant also needs to provide an appropriate site-specific freeboard allowance, inclusive of climate change. It is up to the applicant to demonstrate and provide evidence to justify their freeboard allowance. Raised finished floor levels should then be calculated accordingly. Further information can be found here - [Accounting for residual uncertainty: an update to the fluvial freeboard guide - GOV.UK \(www.gov.uk\)](https://www.gov.uk/guidance/accounting-for-residual-uncertainty-an-update-to-the-fluvial-freeboard-guide)

Advice to the Applicant/LPA

The following issues are not within our direct remit or expertise, but nevertheless are important considerations for managing flood risk for this development. Prior to deciding this application we recommend that consideration is given to the issues below. Where necessary, the advice of relevant experts should be sought.

- Details and adequacy of flood proofing and other building level resistance and resilience measures
- Details and adequacy of an emergency plan
- Adequacy of rescue or evacuation arrangements
- Provision of and adequacy of a temporary refuge

Flood resistance and resilience

We strongly recommend the use of flood resistance and resilience measures. Physical barriers, raised electrical fittings and special construction materials are just some of the ways you can help reduce flood damage.

To find out which measures will be effective for this development, please contact your building control department. If you'd like to find out more about reducing flood damage, visit the Flood Risk and Coastal Change pages of the planning practice guidance. Further guidance on flood resistance and resilience measures can also be found in: *Government guidance on flood resilient construction*

<https://www.gov.uk/government/publications/flood-resilient-construction-of-new-buildings>

CIRIA Code of Practice for property flood resilience

https://www.ciria.org/Research/Projects_underway2/Code_of_Practice_and_guidance_for_property_flood_resilience.aspx

British Standard 85500 – Flood resistant and resilient construction

<https://shop.bsigroup.com/ProductDetail/?pid=000000000030299686>

Flood warning and emergency response

We do not normally comment on or approve the adequacy of flood emergency response procedures accompanying development proposals, as we do not carry out these roles during a flood. Our involvement with this development during an emergency will be limited to delivering flood warnings to occupants/users covered by our flood warning network.

[Planning practice guidance](#) (PPG) states that, in determining whether a development is safe, the ability of residents and users to safely access and exit a building during a [design flood](#) and to evacuate before an extreme flood needs to be considered. One of the key considerations to ensure that any new development is safe is whether adequate flood warnings would be available to people using the development.

In all circumstances where warning and emergency response is fundamental to managing flood risk, we advise local planning authorities to formally consider the emergency planning and rescue implications of new development in making their decisions. As such, we recommend you refer to '[Flood risk emergency plans for new development](#)' and undertake appropriate consultation with your emergency planners and the emergency services to determine whether the proposals are safe in accordance with paragraph 167 of the NPPF and the guiding principles of the PPG.

Signing up for flood warnings

The applicant/occupants should phone Floodline on 0345 988 1188 to register for a flood warning, or visit <https://www.gov.uk/sign-up-for-flood-warnings>. It's a free service that provides warnings of flooding from rivers, the sea and groundwater, direct by telephone, email or text message. Anyone can sign up.

Flood warnings can give people valuable time to prepare for flooding – time that allows them to move themselves, their families and precious items to safety. Flood warnings can also save lives and enable the emergency services to prepare and help communities.

For practical advice on preparing for a flood, visit <https://www.gov.uk/prepare-for-flooding>.

To get help during a flood, visit <https://www.gov.uk/help-during-flood>.

For advice on what to do after a flood, visit <https://www.gov.uk/after-flood>.

Please do not hesitate to contact me using the contact details shown below should you have any queries regarding the above information.

Yours faithfully

Mrs Sophie Brown
Sustainable Places Planning Advisor

Direct dial 0203 0257 250

Direct e-mail planningSSD@environment-agency.gov.uk