

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

Our ref: HA/2024/126293/02-L01
Your ref: APP/24/00746
Date: 19 December 2024

Dear Sir/Madam

AMENDED FRA - DEMOLITION OF EXISTING BUNGALOW AND ERECTION OF NEW TWO STOREY REPLACEMENT DWELLING INCLUDING SOLAR PANELS AND FLOOD DEFENCES.

24 TRELOAR ROAD, HAYLING ISLAND, PO11 9SE

Thank you for the consultation on the above application, please quote our reference on all correspondence.

Environment Agency position

We have reviewed the submitted information and are satisfied our objection to the proposal can be removed.

The proposed development will only meet the National Planning Policy Framework's requirements if the following planning condition/s are included.

We are including the following conditions to the submitted revised FRA (ref: *AMENDED_FLOOD_RISK_ASSESSMENT-2045078*) dated 22/11/2024) due to a failure to update the proposed design plan as requested in our previous response. It is important that the applicant acknowledges that are only accepting the application from a flood risk perspective based on the revised FRA.

The development shall be carried out in accordance with the submitted flood risk assessment (ref: *AMENDED_FLOOD_RISK_ASSESSMENT-2045078*) dated 22/11/2024) and the following mitigation measures it details:

- **Ground finished floor levels shall be set no lower than 1.60 metres above Ordnance Datum (AOD)**
- **First flood finished floor level shall be set no lower than 4.30 metres above Ordnance Datum (AOD)**

Environment Agency
Canal Walk, ROMSEY, Hampshire, SO51 7LP.
Customer services line: 03708 506 506
www.gov.uk/environment-agency

Cont/d..

These mitigation measures shall be fully implemented prior to occupation and subsequently in accordance with the scheme's timing/phasing arrangements.

The measures detailed above shall be retained and maintained thereafter throughout the lifetime of the development.

Reason(s)

- To reduce the risk of flooding to the proposed development and future occupants

Advice to LPA/Applicant

We are removing our objection to this application as the applicant intends to create a betterment to the existing dwelling and risks associated with the site. The applicant has demonstrated a range of appropriate measures that can potentially mitigate the risk associated with the site, but we acknowledge that there are constraints to what the applicant can do to achieve further resilience and resistance measures.

Therefore, we accept the updated increase of the finished floor levels as stated within the revised FRA and have conditioned that the new dwelling be built according to what is stated – 1.60mAOD ground FFL and 4.30mAOD first FFL. We acknowledge that although the future design flood level is high, that ultimately this proposal presents a betterment to the existing single-storey dwelling.

Please note that the high future flood levels referenced within your FRA (4.53mAOD), demonstrate that the ground floor levels are expected to reach high depths of over 3 metres. Although the applicant has demonstrated that the first finished floor levels will be set at 4.30m AOD, our concern remains that the adequacy of the first floor safe refuge may be compromised. As the applicant has addressed that they will be signing up to flood warnings and have prepared an evacuation plan for the LPA to agree, we emphasise, as was done by the applicant within the revised FRA, that the occupants should ensure to follow the flood evacuation plan and evacuate the premises within 10 hours of receiving the flood warning alert.

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
- Provision of and adequacy of a temporary refuge
- Details and calculations relating to the structural stability of buildings during a flood

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>

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.

We have considered the findings of the flood risk assessment in relation to the likely duration, depths, velocities and flood hazard rating against the design flood for the proposal. We agree that this indicates that there will be:
A danger for all people (e.g. there will be danger of loss of life for the general public and the emergency services).

This does not mean we consider that the access is safe, or the proposals acceptable in this regard. We remind you to consult with your emergency planners and the emergency services to confirm the adequacy of the evacuation proposals.

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>.

Yours faithfully

Miss Suz Greenwood
Planning Advisor, Environment Agency

Direct dial 02084745098

Direct fax

Direct e-mail suz.greenwood@environment-agency.gov.uk

End