

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

Our ref: HA/2024/126391/01-L01
Your ref: APP/24/00993
Date: 06 January 2025

Dear Sir/Madam

IMPROVEMENTS TO FLOOD DEFENCE, PROPOSED ROOF ALTERATIONS TO REAR ELEVATION AND CONSTRUCTION OF SIDE ELEVATION DORMER. GENERAL DOOR AND WINDOW CHANGES THROUGHOUT

152 HAVANT ROAD, HAYLING ISLAND, PO11 0LJ

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

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. Due to the high risk of flooding from the main river and sea to this site, this application will benefit from an adequate site-specific flood risk assessment. This information will be useful in addressing the following flood risk concerns outlined below.

Reason(s)

The submitted FRA 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
 - There is no assessment of the impact of climate change using appropriate climate change allowances for a 1 in 200-year tidal flooding event plus climate change and a 1 in 1000-year fluvial flood event plus climate change for the lifetime of the development (100 years for residential) ['Flood risk assessments: climate change allowances'](#).

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

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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 200-year tidal flooding event and a 1 in 1000-year fluvial flood event plus climate change for the lifetime of the development (100 years for residential). Consequently, the development proposes inadequate:

- Safe access and egress routes
- Resistance and resilience measures

Overcoming our objection

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.

Advice to the Applicant/LPA

We advise that the applicant provides an adequate site-specific flood risk assessment for a 1 in 200-year tidal flood event plus climate change and a 1 in 1000-year fluvial flood event plus climate change for the lifetime of the development (100 years for residential). Although we would not normally object to proposals for minor development and improvement works, we think that due to the high risk of flooding from both the main river and sea, more information will need to be provided to address the following flood risk concerns.

As demonstrated within the proposed design plans (ref: *PROPOSED_FLOOR_PLANS-2051139.pdf*), we are concerned that extensions to the existing surrounding walls and property may reduce flood storage capacity and increase flood risk elsewhere. We request that the applicant requests Product 4 data to assess flood risk for both tidal and fluvial flood events. And outline within your resubmitted application the site-associated flood risks and potential mitigation measures.

The applicant has not included flood level data within the FRA. 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 for both the 1 in 200-year tidal flood event and a 1 in 1000-year fluvial flood event for the lifetime of the development (100 years for residential). 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.

The applicant should indicate whether access and egress is possible and outline a safe route in a 1 in 200-year tidal event plus climate change and a 1 in 1000-year fluvial event plus climate change for the lifetime of the development.

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>

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>.

Environmental permit

The Environmental Permitting (England and Wales) Regulations 2016 require a permit or exemption to be obtained for any activities which will take place:

- on or within 8 metres of a main river (16 metres if tidal)
- on or within 8 metres of a flood defence structure or culverted main river (16 metres if tidal)
- on or within 16 metres of a sea defence
- involving quarrying or excavation within 16 metres of any main river, flood defence (including a remote defence) or culvert
- in the floodplain of a main river if the activity could affect flood flow or storage and potential impacts are not controlled by a planning permission

For further guidance please visit <https://www.gov.uk/guidance/flood-risk-activities-environmental-permits> or contact our National Customer Contact Centre on 03708 506 506 (Monday to Friday, 8am to 6pm) or by emailing enquiries@environment-agency.gov.uk.

The applicant should not assume that a permit will automatically be forthcoming once planning permission has been granted, and we advise them to consult with us at the earliest opportunity.

If you are minded to approve the application contrary to our objection, we would be grateful if you could re-notify the Environment Agency to explain why material considerations outweigh our objection, and to give us the opportunity to make further representations. Should our objection detailed above be removed, it is likely we will recommend planning conditions to be included on any subsequent approval.

Yours faithfully

**Miss Suz Greenwood
Planning Advisor, Environment Agency**

Direct dial 02084745098

Direct fax

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