

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

**Our ref:** HA/2025/126434/03-L01  
**Your ref:** APP/24/00968  
**Date:** 02 July 2025

Dear Sir/Madam

**\*NEW FRA\*FULL PLANNING APPLICATION FOR THE DEVELOPMENT OF 4NO COMMERCIAL UNITS (E USE) AND 32NO RESIDENTIAL UNITS (C3 USE) OVER 4 FLOORS WITH ASSOCIATED OPEN SPACE, PUBLIC REALM ENHANCEMENTS, DEMOLITION OF THE EXISTING BEACHLANDS AMUSEMENT ARCADE BUILDINGS AND DWELLING AND ASSOCIATED WORKS.**

**BEACHLANDS, 5 SEA FRONT, HAYLING ISLAND**

Thank you for the consultation on the additional information for the above application.

### **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(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:

- consider how a range of flooding events (including extreme events) will affect people and property
  - consider the requirement for flood warning and evacuation of people for a range of flooding events up to and including the extreme event
- Specifically, the FRA provides predicted flood levels for the design event (the 0.5% annual estimated probability event in 2125) but does not provide flood depths during a

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range of flooding events, including the extreme event (the 0.1% annual estimated probability event in 2125).

### **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 Applicant/Local Planning Authority**

Thank you for providing the Flood Risk Assessment Addendum (report ref: 2400840-ACE-XX-XX-RP-C-0302 dated June 2025). The addendum addresses some of the points raised in our response dated 01 May 2025 and now applies the correct climate change allowances.

It does not yet provide sufficient information about the flood characteristics that will be experienced on the site, specifically relating to flood depth, velocity, duration, speed of onset and frequency. Whilst it is straightforward to derive some of this information within the proposed buildings using the flood level and finished floor level information provided, the flood characteristics listed above cannot be deduced for the access and egress routes to Flood Zone 1 without post development ground level information. Flood characteristic information was requested in our response dated 01 May 2025, which stated 'without an accurate assessment of flood characteristics (flood depth, velocity, duration, speed of onset and frequency) it is not possible to assess the potential risk to the ground floor units or to the access and egress routes to be used as evacuation pathways. This information is needed to enable an informed decision to be made about the suitability of the development in the context of flood risk and if the proposed mitigation measures are sufficient to make the development safe (and therefore comply with the NPPF).'

Yours faithfully

**Miss Suz Greenwood**  
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