

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

Our ref: HA/2023/125442/01-L01
Your ref: APP/23/00686
Date: 30 October 2023

Dear Planning Team,

EMOLITION OF EXISTING TWO STOREY DWELLING AND ERECTION OF REPLACEMENT THREE STOREY DWELLING WITH RAISED DECKING, BALCONIES AND EXTERNAL STAIRCASE TOGETHER WITH ERECTION OF OFFICE/STORE OUTBUILDING. 174 SOUTHWOOD ROAD, HAYLING ISLAND, PO11 9Q

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

We have no objection to the proposed development as submitted, provided that the following condition be attached to any planning permission granted. The proposed development will only meet the National Planning Policy Framework's requirements in relation to flood risk if the following planning condition is attached to any planning permission given for the development.

Condition

The development shall be carried out in accordance with the submitted FRA (ref: *FLOOD_RISK_ASSESSMENT_FRA-1848034* dated 22nd June 2023) and the revised supporting information submitted on the 10th February 2023 and the following mitigation measures it details:

- Finished floor levels of the ground floor shall be set no lower than 5.0 metres above Ordnance Datum (AOD) as seen in Section 1: Executive Summary and Section 12.3: Post Development Tidal Flood Risk
- No sleeping quarters are to be located on the ground floor as seen in Section 12.4: Mitigation Measures

Environment Agency
Guildbourne House Chatsworth Road, Worthing, West Sussex, BN11 1LD.
Customer services line: 03708 506 506
www.gov.uk/environment-agency

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- Safe refuge should be accessible on the upper floors to all occupants as seen in Section 1: Executive Summary and Section: 18.1.3 Flood management and evacuation procedures
- Resilience and Mitigation measures should be agreed with the LPA fully implemented as proposed in Section 12.4: Mitigation Measures
- A Flood Warning and Emergency Plan should be developed and agreed with the LPA prior to occupation as seen in Section 12.4: Mitigation Measures
- EA Flood Warning Service - The site owner and/or residents will be required to sign up to the EA Flood Warning Service as seen in Section: 18.1.1 Environment Agency Flood Warning Service

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

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

Advice to 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.

- Adequacy of rescue or evacuation arrangements
- Details and adequacy of an emergency plan
- Provision of and adequacy of a temporary refuge
- Details and adequacy of flood proofing and other building level resistance and resilience measures
- Provision of an adequate means of surface water disposal such that flood risk on and off-site isn't increased.
- Details and calculations relating to the structural stability of buildings during a flood
- Whether insurance can be gained or not

Advice to LPA

Future Flood Levels

This proposal currently lies in Flood Zone 2 and 3, and with climate change it will be at significant risk of flooding for its lifetime.

The FRA states in Section 12.3 Post Development Tidal Flood Risk that the EA provided a 1 in 200-year flood level of 3.32m AOD. This level comes from still water levels from the East Solent Coastal Model 2018 on the seaside of the flood defences before the impact of wind and waves is considered where the defences will be over-topped. In the south garden of the property, the EA also provided a level of 4.65m AOD which is higher due to the waves over-topping the defences and pooling in the garden.

Using the still water levels of 3.32m AOD, the future flood levels for the lifetime of the development including climate change would be 4.4m AOD for the Higher Central (HC) and 4.77m AOD for the Upper End (UE) allowances. These levels give a good indication of the expected future flood levels that the property could experience in its lifetime.

If climate change was added to the garden levels of 4.65m AOD taken from the East Solent Model, the levels would be 5.72m AOD for the Higher Central (HC) and 6.09m AOD for the Upper End (UE) allowances. These levels are unlikely to be seen in reality, and therefore our decision has been based on the still water levels. Please note that the property is still at severe risk of flooding in the future, and why resistance and resilience mitigation measures will also be required.

Finished Floor Levels (FFL)

The existing property has a FFL of 4.25m AOD and the proposed development has a ground floor FFL of 5.0m AOD. As a replacement dwelling, this is a betterment of 0.75m over the existing.

With the still water future flood levels for the lifetime of the development of 4.77m AOD for the UE allowance, the proposed ground floor FFL of 5.0m AOD provides freeboard of 0.230m.

These FFL's are below what we would normally accept for a new build development, but as this is a replacement development application with a significant FFL betterment to what currently exists, including no bedrooms proposed on the ground floor, we feel that it would be acceptable with adequate resilience and resistance mitigation measures.

Please note that these measures are normally only acceptable up to 600mm from either the ground level, or from the ground floor level if it was concrete. Structural engineers will need to determine the adequacy of the structural integrity of the building if flood levels were to exceed the 600mm from the ground level, or the ground floor level if it was made of concrete.

Access and Egress

We note that the road levels outside the property are around 3.2m AOD which means during a design flood event access and egress may not be possible. Therefore, the importance of the occupants having a comprehensive Flood Warning and Emergency Plan, plus signing up to the Environment Agency Flood Warning System will be of vital importance.

South Hayling Beach Management Plan

The North Solent Shoreline Management Plan identifies a policy of Hold the Line for the Hayling open coast. A policy is put in place for a project to keep the coastline in the same place and maintain that level of protection by the existing defences.

Advice to LPA/applicant - 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](https://www.gov.uk/government/publications/flood-resilient-construction-of-new-building) building

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>

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>.

Advice to Applicant

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 a floodplain more than 8 metres from the river bank, culvert or flood defence structure (16 metres if it's a tidal main river) and you don't already have 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.

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