

Ref: C2244

Date: 19.07.2023

Re: Environment Agency Position: Objection

Dear Planning Team,

With reference to current planning application APP/23/00193 for the part demolition and part redevelopment of existing buildings and change of use from class a2, b1(c) and b8 to c3 use with the construction of 7 town house dwellings and 10 apartments, at the land rear of and 15a-15c South Street, Havant.

This letter has been written in response to the points of objection raised by the Environment Agency (EA) in respect to flood risk to the propose development. Our responses to each point are presented below.

- **Consider how people will be kept safe from the identified flood hazards:**

We believe this has been fully addressed in Sections 7, 8 and 9, and ask that this is re-reviewed in context to the below responses.

- **Consider how a range of flooding events (including extreme events) will affect people and property**

The FRA has considered the Design Flood Event (DFE) (being the 1% AEP for the dominant source of flooding being fluvial) based on the 2115 PUSH FRA climate change mapping (refer to Section 6 of the FRA. This is the highest order, most up to climate data for fluvial flooding available, for the site (and given it is more recent than the Product 4 data supplied by the EA, it is considered to supersede the EA data). The PUSH SFRA shows that the site is not affected by Fluvial Flooding. As such, unless the EA can provide evidence to suggest that the PUSH SFRA data is incorrect, we argue that the PUSH SFRA data is adopted.

- **Take the impacts of climate change into account up to 2123**

There is no publicly available information to determine this and without under taking very costly catchment scale fluvial modelling, there is no reasonable means to predict what the 2123 fluvial flood level will be as the Hydraulic Grade line of the fluvial flood extents is not flat and so cannot simply be extrapolated and extended to estimate a reasonable Design Flood Level in a complex flood area. Unless the EA can provide a means to estimate this, we maintain that the 2115 PUSH SFRA data is still reasonably accurate. In addition, the SFRA data shows very little difference between the 2025 climate change event and the 2115 climate change event, meaning the fluvial flooding is not overly climate change sensitive (this is discussed in the FRA). As such the 2115 event could be used to approximate the 2123 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 the 2123 1 in 100 year (1% AEP) fluvial event. Consequently, the development proposes inadequate:**

- Flood storage compensation – Not required as the development proposals do not displace flooding
- Raised finished floor levels – Not required as there is Commercial at ground floor
- Resistance and resilience measures – Recommendation that the **Water exclusion strategy** from the CLG is adopted
- Safe access and egress routes – Refer to Section 9 of the FRA

Should you have any further questions, we would welcome a meeting to discuss further to clarify our assessment.

Regards,

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