

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

Our ref: HA/2022/124646/03-L01
Your ref: APP/22/00860
Date: 13 September 2023

Dear Planning Team,

**FRA SUBMITTED - INSTALL A FREE STANDING TIMBER FRAMED SELF
CONTAINED ANNEXE WITH DRAINAGE AND SERVICES 34 WITTERING ROAD,
HAYLING ISLAND, PO11 9SP**

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

In the absence of an acceptable flood risk assessment (FRA) we **object** to this application and recommend that planning permission is refused.

Reason

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 people will be kept safe from the identified flood hazards
- take the impacts of climate change into account.
 - Different climate change allowances have been used to assess future flood risk than those advised in '[Flood risk assessments: climate change allowances](#)', without adequate justification
 - Flood risk mitigation measures to address flood risk for the lifetime of the development included in the design are inadequate because they will not

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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make the development resilient to the flood levels for the 1 in 200 year (0.5% AEP) using the Upper End climate change allowance. Consequently, the development proposes inadequate:

- Raised finished floor levels
- Resistance and resilience measures
- Safe access and egress routes

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.

The applicant needs to calculate the design flood level, which should consist of:

- The present day 1 in 200 year (0.5% AEP)
- Consideration for climate change up until 2123 using the Upper End climate change allowance.
- A suitable freeboard.

Environment Agency freeboard guidance: <https://www.gov.uk/flood-and-coastal-erosion-risk-management-research-reports/accounting-for-residual-uncertainty-an-update-to-the-fluvial-freeboard-guide>

The applicant should then use this level to compare flood risk at the site, proposing suitable:

- Finished floor levels
- Flood resistance and resilience levels
- Safe access and egress

This application is for a more vulnerable development located within the Environment Agency mapped tidal Flood Zone 3 (high probability of tidal flooding). The design flood level will be essential for the LPA to determine key aspects of this development, including:

- Finished floor levels
- Flood resistance and resilience levels
- Safe access and egress

Advice to the Local Planning Authority

If you are minded to approve the application contrary to our objection, we would be grateful if you could re-notify us 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.

In accordance with the Planning Practice Guidance (Ref. ID: 20150415), please notify us by email within 2 weeks of a decision being made or application withdrawn. Please provide us with a URL of the decision notice, or an electronic copy of the decision notice or outcome.

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-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>

Exception Test

In accordance with the National Planning Policy Framework (paragraphs 164 and 165), the proposed development is appropriate provided that the site meets the requirements of the exception test. Our comments on the proposals relate to the part of the exception test that demonstrates the development is safe. The local planning authority must decide whether or not the proposal provides wider sustainability benefits to the community that outweigh flood risk.

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