

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

Our ref: HA/2023/125177/01-L01
Your ref: APP/23/00381

Date: 28 June 2023

Dear Planning Team,

**DEMOLITION OF EXISTING CHALET BUNGALOW WITH SINGLE GARAGE AND
REPLACEMENT WITH NEW SINGLE STOREY BUNGALOW WITH INTERNAL
MEZZANINE AND SINGLE GARAGE**

197 SOUTHWOOD ROAD, HAYLING ISLAND, PO11 9PZ

Thank you for consulting the Environment Agency on the above application.

We have reviewed the information as submitted and set out our position and comments 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.

Reasons

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
- consider how a range of flooding events (including extreme events) will affect people and property
- consider the requirement for flood emergency planning including flood warning and evacuation of people for a range of flooding events up to and including the extreme event
- take the impacts of climate change into account for the 2123 1 in 200-year (0.5% AEP) flood event using the Upper End climate change allowance.
 - There is no assessment of the impact of climate change using appropriate climate change allowances '[Flood risk assessments: climate change allowances](#)'
 - 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 2123 1 in 200-year

event (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 submit an FRA which considers the 2123 design flood level. The design flood level should consist of:

- 1 in 200 year (0.5% AEP) flood level
- Climate change until 2123 using the Upper End climate change allowance
- A suitable freeboard.

Once the design flood level has been calculated, the applicant will need to compare this level against development proposals.

Climate change allowances: <https://www.gov.uk/guidance/flood-risk-assessments-climate-change-allowances>

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>

Advice to the Local Planning Authority

If you are minded to grant permission against our advice, please contact the Sustainable Places Advisor named below before making a formal decision to discuss the conditions and advice that we would wish to apply to this proposal.

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 Applicant

If the Applicant would like any further detailed advice we would be happy to provide this subject to a charge.

As part of this service you would have a dedicated project manager to coordinate the advice from different teams within the Environment Agency. It would also include bespoke technical and planning advice if you request this. This will allow you to have greater clarity about the assessments you need to accompany your planning application and certainty about whether the development is acceptable to us before you resubmit.

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 the Local Planning Authority and 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>

British Standard 85500 – Flood resistant and resilient construction

<https://shop.bsigroup.com/ProductDetail/?pid=000000000030299686>

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