

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

Our ref: HA/2020/122753/01-L01
Your ref: APP/20/00998
Date: 09 December 2020

Dear Sir/Madam,

**DEMOLITION OF EXISTING DWELLING AND OUTBUILDINGS AND
CONSTRUCTION OF REPLACEMENT DWELLING AND OUTBUILDINGS.**

NORTHSHORE, 40 SINAH LANE, HAYLING ISLAND, PO11 0HH

Thank you for the 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 application's red line site boundary lies within Flood Zone 3, which is land defined by the planning practice guidance as having a high probability of flooding.

The National Planning Policy Framework (paragraph 163, footnote 50) states that an FRA must be submitted when development is proposed in such locations.

The submitted FRA does not comply with the requirements for site-specific flood risk assessments, as set out in paragraphs 30 to 32 of the Flood Risk and Coastal Change section of the planning practice guidance. The FRA does not therefore adequately assess the flood risks posed by the development. In particular, the FRA fails to:

- The current FRA fails to adequately assess flood risk for the lifetime of the development.
- 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

An FRA is vital to making informed planning decisions. In its absence, the flood risks posed by the development are unknown. This is sufficient reason for refusing planning permission

Overcoming our objection

We recognise that the Applicant, using our Flood map for planning service, has submitted a document defining the site as Flood Zone 1 and as such has included no FRA. However, given the site incorporates Flood Zone 3 and submitted documentation indicates development occurring in the designated Flood Zone, it is required that an FRA assessing the risk to this development for its lifetime is submitted.

We would expect the applicant to assess the future flood levels with appropriate climate change allowances as described in Table 1: peak river flow allowances by river basin district for the South East, Central and Higher Central allowances '[Flood risk assessments: climate change allowances](#)'. We have included further advice on this below.

In general, we require that the Finished Floor Levels (FFLs) of any proposed development is set 600mm above the predicted flood level with appropriate climate change allowances for the lifetime of the development. Should this not be achieved, justifications should be given in the FRA and FFLs should be set no lower than 300mm above the predicted flood level with appropriate climate change allowances lifetime of the development.

To overcome our objection, the applicant should submit an FRA which demonstrates that the development is safe without increasing risk elsewhere. Where possible, it should reduce flood risk overall.

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. Guidance on how to prepare a flood risk assessment can be found at <https://www.gov.uk/guidance/flood-risk-assessment-for-planning-applications>.

Advice to Local Planning Authority/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. In the meantime, 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. The following documents may also be useful:
Department for Communities and Local Government: Preparing for floods
<http://www.planningportal.gov.uk/uploads/odpm/4000000009282.pdf>
Department for Communities and Local Government: Improving the flood performance of new buildings: <https://www.gov.uk/government/publications/flood-resilient-construction-of-new-buildings>

Advice to Applicant

FRA sources of information

We do not prepare or provide FRAs. However, our Customers and Engagement team can provide any relevant flood risk information that we have available (including climate change data). Please contact SSDEnquiries@environment-agency.gov.uk and ask for a 'Product 4' including climate change levels and allowances. When sending your request, do also include a location map for the site. Requests are usually dealt with within 20 working days. Please detail the areas of interest and provide a site plan to ensure that our team gives you data specific to the areas that it is needed.

Your Local Planning Authority should have undertaken a Strategic Flood Risk Assessment (SFRA) which will also include local flood risk information to inform your FRA. Please contact your Local Planning Authority to determine what information is available.

Further advice on what to include in an FRA can be found here – <https://www.gov.uk/guidance/flood-risk-and-coastal-change#site-specific-flood-risk-assessment-all>

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 do after a flood, visit <https://www.gov.uk/after-flood>.

Charged Advice

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.

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.

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.

Please do not hesitate to contact me should you have any queries on the above information.

Yours faithfully.

Mrs Sophie Brown
Sustainable Places Planning Advisor

Direct dial 02030 257250

Direct e-mail planningSSD@environment-agency.gov.uk