

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

Our ref: HA/2023/124748/01-L01
Your ref: APP/22/00993
Date: 23 January 2023

Dear Sir/Madam

VARIATION OF CONDITION 1- ERECTION OF FOUR DWELLINGS WITH THE ASSOCIATED VEHICULAR AND PEDESTRIAN ACCESS AND LANDSCAPING AND REPLACEMENT CULVERT LAND ADJ 15 BILLETT AVENUE, WATERLOOVILLE, PO7 7SZ

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

The proposed development will only meet the National Planning Policy Framework's requirements in relation to flood risk if the following planning condition is included.

Condition

The development shall be carried out in accordance with the submitted flood risk assessment (ref; "*15 Billett Avenue, Flood Risk Assessment*" dated; 31 October 2018 Compiled by *Hamill Davies Ltd*) and the following mitigation measures it details:

- Finished floor levels shall be set no lower than 40.87 metres above Ordnance Datum (AOD)
- Access to the culvert shall be maintained, as shown in Drawing *16-2654-2102*
- All proposed development shall occur in FZ1. No development shall take place in FZ 2 & 3.

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.

Reasons

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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To reduce the risk of flooding to the proposed development and future occupants. To reduce the risk of flooding from blockages to the existing culvert(s)

Advice to Applicant

Please note although the applicant has applied for a Product 4 from the Environment Agency, the design flood level plus climate change allowances do not align with our calculations. As the FRA and associated information has not been updated since 2018, this means the most up to date climate change allowances have not been applied. The FFL's in this case are sufficient to protect the development from flooding with freeboard allowances, but the applicant should consider using the most accurate and up to date figures (UKCP19).

The FRA and associated information has not been updated since 2018 and therefore does not reflect the newly installed culvert. As the property has sufficient freeboard at future and present day levels, we assess the risk of flooding to be low so long as no development occurs within FZ 2/3 which would obstruct or divert flood water. Please refer to the following document in regards to riparian ownership of the culvert; [Owning a watercourse - GOV.UK \(www.gov.uk\)](https://www.gov.uk/government/publications/owning-a-watercourse). Also, as stated in the conditions no development shall take place in FZ 2/3, otherwise floodplain compensation will be required.

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. 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>

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.

Advice to LPA/applicant

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
- Details and calculations relating to the structural stability of buildings during a flood
- Whether insurance can be gained or not
- Provision of an adequate means of surface water disposal such that flood risk on and off-site isn't increased

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