

**FLOOD RISK ASSESSMENT
&
SUDS Strategy for Planning
(focus on residual surface water flood risk)**

Compliant with LLFA SUDS Guidance

NPPF & EA Compliant

**Brownfield site
Re-establish dwelling (replacement dwelling)
Erect a modern fully flood future-proofed dwelling
Site is within FZ1 but also within PUSH SFRA climate
change flood extents**

**This is a residual risk in accordance with NPPF (Paragraph: 041 Ref ID: 7-041-20140306);
the proposed operation is site and scheme specifically appropriate**

**CRITICAL: All site users have access to above the extreme flood level for the
lifetime of the scheme including for 2021 climate change allowances uplift**

at:

19 St Peters Avenue, Hayling Island, PO11 0SA

January 2021

ARK Environmental Consultancy Ltd

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If this report has been released electronically, the appendices referred to herein can be found in the annexed zip folder/s as .pdf or .dwg files. If this report has been released in hard copy the appendices will be bound into the back of this report. Plans may be annexed separately as A1 or A0 copies where a bound-in A3 copy is not appropriate.

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1.0 Scope

This report contains the details of a Flood Risk Assessment carried out by Ark Environmental Consultancy Limited ("ARK Ltd") for 19 St Peters Avenue, Hayling Island, PO11 0SA, henceforth referred to as "the site" in this report. This report has been prepared for Burras Ltd and must not be relied upon by any other party without the explicit written permission of ARK Ltd. All parties to this report do not intend any of the terms of the Contracts (Right of Third Parties Act 1999) to apply to this report. Please note this report does not purport to provide definitive legal advice nor can it be used to demonstrate that the site will never flood in the future.

The Executive Summary contains an overview of key findings and conclusions. However, no reliance should be placed on the Executive Summary until the whole of the report has been read. Other sections of the report may contain information which puts into context the findings noted within the Executive Summary.

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2.0 Executive Summary

This FRA&SUDS Strategy for Planning has been carried out in accordance with the National Planning Policy Framework & NPPG to assist the council and EA in their assessment of the planning application.

The proposed development is to erect a replacement dwelling with new porous & permeable areas maximized and new SUDS.

- All site users now have access to above the extreme flood level of the lifetime of the scheme
- The residual risks are not unacceptable based on the assessment of the data, site and scheme and as per the PUSH SFRA analysis and guidance

Replacement dwelling: no trigger for objection as scheme is NPPF and EA compliant.

- Site is within and with access to unrestricted FZ1
- Site is within PUSH SFRA climate change extents (no site specific flood levels available)
- Within NO - VERY LOW surface water hazard based on site specific mapping
- REDUCES FLOOD RISK OVERALL
 - Maximise porous and permeable areas
- Resilient and resistant measures
- **Results in better protected and flood future proofed dwelling than existing**

This is categorized as a "More Vulnerable" in FZ1 / PUSH SFRA climate change extents.

- Semantically the Exception Test is not required as per the NPPF guidance
- **Technically however, this assessment considers the Exception Test is passed regardless, based on the site and scheme specifics**

The hazard is a confirmed residual risk in accordance with NPPF (Paragraph: 041 Ref ID: 7-041-20140306); the proposed operation is site and scheme specifically appropriate.

Given the residual risk flood setting, the level, extent and depth of flooding on the site can be managed in terms of resistant and resilient measures and precautionary mitigation measures.

Based on the likely flooding risk and small scale of the proposed development, it is considered that the proposed development can be constructed and continue to be operated safely in flood risk terms,

without increasing flood risk elsewhere; it is therefore considered appropriate development in accordance with the NPPF / PPG.

3.0 Introduction

The FRA combined a desktop study, review of available information, consultations and an assessment of all sources of flooding posed to and from the site and proposed development, in accordance with NPPF & NPPG. Appropriate flood mitigation measures were then considered, either as already incorporated within the scheme or recommended for inclusion at detailed design stage. The suitability of the proposed development was also reviewed in the context of the NPPF/NPPG and any relevant technical guidance accompanying the NPPF.

4.0 Purpose of the Report

This FRA has been carried out in accordance with National Planning Policy Framework (NPPF) & PPG.

The report provides the following information in accordance with the NPPF:

- An assessment of the flood risk posed to the site based on flood information and mapping provided by the EA and Strategic Flood Risk Assessment (SFRA);
- An assessment of the proposed development in terms of surface water run-off; and
- Proposals for measures to mitigate the flood risks posed to and from the development where appropriate.

5.0 Report Information Sources

The information source used to undertake this FRA has been collected from the following sources:

- British Geological Survey Website & iGeology App
- EA Website & Data
- Havant Council Strategic Flood Risk Assessment (2018 Plan Allocations and as updated)
- PUSH SFRA & climate change mapping (2016 Update and as updated)
- **Havant Flood Risk Sequential Test & Exception Test Guidance for Development Management Havant Borough Council - Planning Policy October 2020**
- Havant Preliminary Flood Risk Assessment (2011 and as updated);
- Hampshire County Council as the Lead Local Flood Authority (LLFA) SUDS Policies and Guidance
- North Solent Shoreline Management Plan
- HAYLING ISLAND EMERGENCY PLANNING FRAMEWORK
- Internet mapping and searches.

6.0 Consultation

Where appropriate, the EA and local council will have been contacted to request any available and relevant flooding data.

7.0 Overview of British Legislation

7.1 National Planning Policy

The National Planning Policy Framework (NPPF) and NPPG supercede all Planning Policy Statements (PPS's) and Planning Policy Guidance (PPG's). Flood risk is retained as a key development consideration.

The Sequential and Exception Tests are retained. The accompanying NPPF Technical Guidance / NPPG also include Tables 2 and 3 to assist with flood risk vulnerability classifications and development suitability.

New Climate Change Allowances and Government SUDS guidance compliant.

7.2 Local Policy

The Strategic Flood Risk Assessment (SFRA) is a key source of flood risk specific information for the area. The SFRA provides a more detailed review of flood risks and recommendations for ensuring developments can be constructed and operated safely in accordance with the NPPF. Greater detail of the SFRA is provided in the report where appropriate.

LLFA SUDS guidance compliant.

8.0 Site Status and Environmental Setting

8.1 Site Location and Status

The site is a Brownfield site, currently occupied by an existing remains of previously demolished dwelling and outbuildings, soft and hard landscaping.

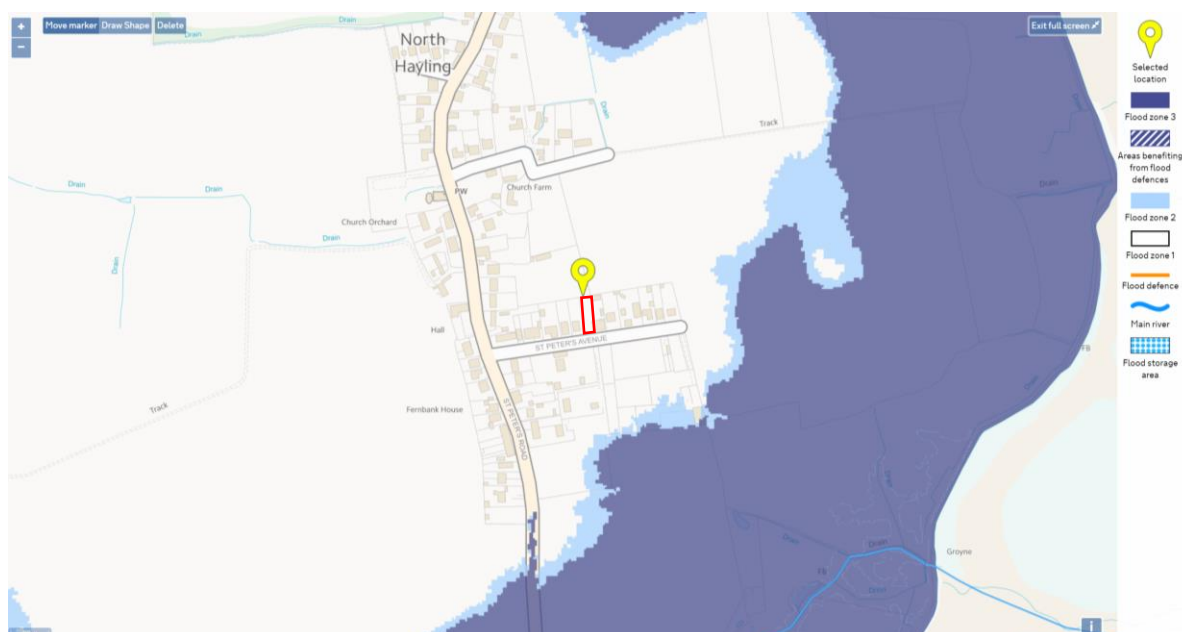
[Permission was granted in 2007 (Application: 07/61610/003) for: "New dwelling to replace bungalow demolished under Planning Permission 97/61610/000".]

The location plan is included in Appendix A.

8.2 Existing Flood Risk

Flood Sources	Site Status	Comment on flood risk posed to / from the development
Fluvial / Tidal	Site is within and with access to unrestricted EA FZ1 Site is within PUSH SFRA climate change extents • Not in a breach or wave action extent • Not in a rapid inundation zone Edge of the future tidal floodplain; immediate access to unrestricted FZ1 even in climate change extents EA official LOW risk	Replacement dwelling is appropriate in FZ1 and FZ3/FZ2 tidal and the scheme can incorporate suitable mitigation measures to address residual surface water risk and access to FZ1 in always LOW hazard. First floor as refuge above extreme event for lifetime of the scheme Results in better protected and flood future proofed dwelling than existing and surrounding dwellings
Groundwater	SWMP indicates site not in potential elevated future groundwater risk	The proposed development will not increase the risk of groundwater flooding; New slabs can be engineered / waterproofed appropriately to industry standard Non return valves and sump

		Low Risk
Artificial Sources	No artificial sources within 250m	Low Risk
Surface Water / Sewer Flooding	Site is in NO – VERY LOW hazard area Evacuation route which is to the north always in NO – VERY LOW hazard Condition, depth and location of surrounding infrastructure uncertain	Scheme can REDUCE FLOOD RISK OVERALL: see main sections below Scheme incorporates new SUDS Development will utilise existing connection to sewers, gravity drainage and non-return valves Development will not increase the peak flow or volume of discharge from the site: Low Risk No further drainage assessment required
Climate Change including new allowances	Included in the flood modelling extents Site not within climate change flood extent area	Development will not increase the peak flow and volume of discharge from the site Low risk posed to and from the development



8.3 Geology (for SUDS)

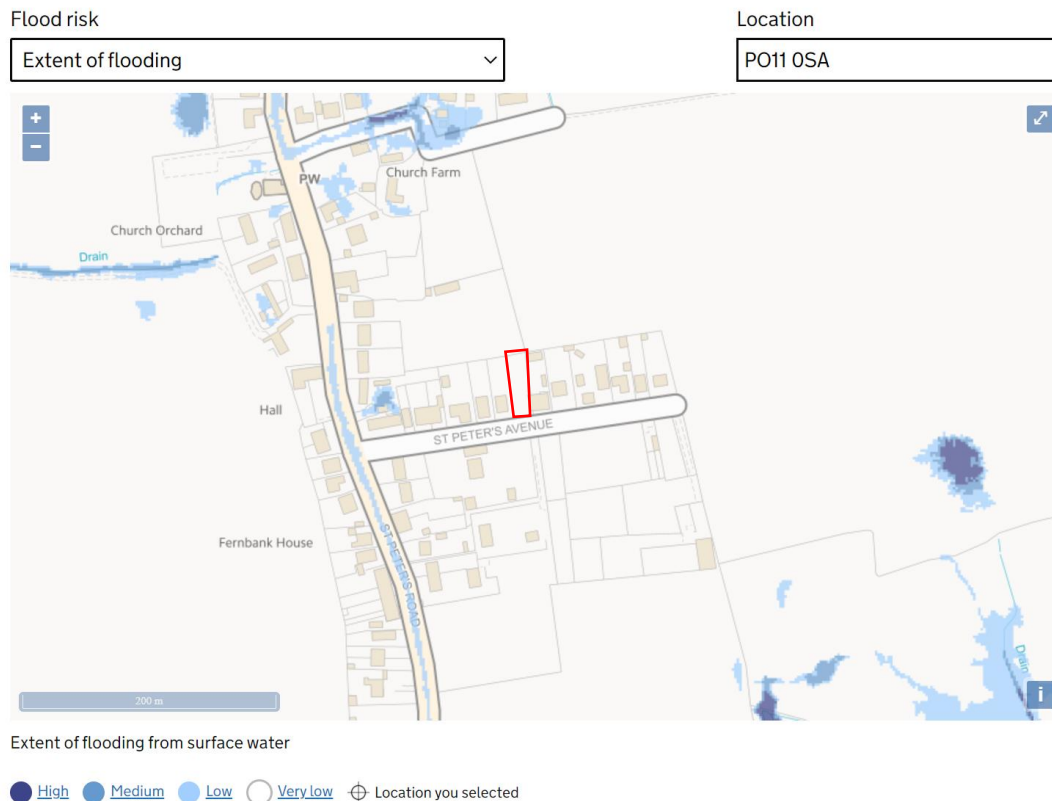
Based on BGS mapping and surrounding adjacent boreholes:

- Bedrock: Lewes Nodular Chalk Formation, Seaford Chalk Formation, Newhaven Chalk Formation, Culver Chalk Formation And Portsdown Chalk Formation (undifferentiated) - Chalk
- Superficial: River Terrace Deposits

No lost / underground rivers documented at the site or near the site nor identifiable by the local geology mapping.

8.4 Surface Water Risk and Hazard Summary

- Property itself is not inundated:
 - In No hazard in all EA risk scenarios
- Access & Egress is always in NO hazard
- Scheme will reduce this flood risk by storing on site and reducing surface water discharge



8.5 SFRA / LFRMS Surface Water Mapping & Hazard

NOTE: the resolution of the SFRA and SWMP mapping is not appropriate to be site specific.

The mapping corroborates the data in the more detailed mapping above.

- The site is in FZ1 in present day
- The site is on the edge of the floodplain in the climate change scenarios
- Floodwaters not likely to immediately reach or inundate the site given the flood setting
- Regardless: scheme can address this residual risk and REDUCE FLOOD RISK OVERALL

8.6 Design Response: address climate change & SUDS Hierarchy

- Replacement dwelling is appropriate in FZ1 / climate change extents as residual hazard
- Establish formal 1st floor
- All site users have access above the extreme flood level for the scheme lifetime
 - NPPF compliant (technically the Exception Test is not required as per the NPPF technical guidance)
 - **Technically however, this assessment considers the Exception Test is passed based on the site and scheme specifics**

REDUCE FLOOD RISK OVERALL

- Maximise porous and permeable areas – significant betterment
- Highest forms of SUDS to be used for a previously 100% un-attenuated site
 - Permeable and Porous areas
 - SUDS storage on site: EA specification for granular angular subbase
 - Soakaway and discharge to sewer (as restricted overflow / back up)
- **Oversized storage for betterment and flood future-proofing**
- Betterment as will attenuate for areas currently unattenuated
- Mandatory and standard resilient measures

8.7 How to address new climate change allowances: please read

We include this section worded deliberately because during COVID times, there have been too many EA responses where it is impossible that reports have been read by the officers: objections have been raised and we have wasted further hours of life having to respond where each answer has been included in the original report.

There should be no objections using the new climate change allowances for this site and scheme.

This is a replacement dwelling which provides a first floor in current FZ1 and at the edge of Tidal FZ3 defended in future climate change allowances scenarios.

Access & egress on the island is the same for all other proposed new dwellings and this site has immediate access within current and to future FZ1 without leaving the island.

The EA do not have site specific flood data because the site is in EA FZ1.

Any additional site specific data are irrelevant to this scheme.

The whole ground and lower floor will be resilient and fully flood future-proofed.

The upper floor is the appropriate response as a replacement better dwelling in flood risk terms.

8.8 Breach Flood Scenario Response

The site is in current EA FZ1. The climate change scenarios are not based on additional raised defences for this area and site; thus there are no breach scenarios. There should not be any objections relating to breach flood data or breach responses.

These data would not alter the designs or the report assessment or recommendations.

9.0 Assessment of Proposed Development

9.1 Proposed Development

The proposed development can be seen in Appendix B.

The proposed development comprises:

- Brownfield site of previous dwelling and outbuildings
- No change of use required: remains “More Vulnerable”
- Remove all impermeable areas
- Erect replacement 2 storey and basement dwelling
- Basement appropriate given no raised floors are required in FZ1 / future climate change
 - Thus, the basement and the bedroom in the basement are appropriate given current FZ1 setting and future residual hazard AND considering:
- **All site users have access to above the extreme flood level for the scheme lifetime**
 - Increase in footprint is acceptable in FZ1 / climate change extents: no flood compensation required
- Maximised porous / permeable areas
- **Reduces flood risk overall**
 - Full new modern flood resilience – see below
 - New porous / permeable and SUDS

As an appropriate response, the site will operate as existing with an improvement based on the design:

- 1) robust resilient construction techniques in order to minimise the damage caused by water entry and also to reduce the time taken to return the property to use after a flood (see later sections)
- 2) Reduce flood risk overall with new lower water demand white goods: betterment of surface water management on the site as a result of the scheme where feasible

Drainage

The existing connections will be retained / additional secured with the water company; non-return valves can be utilized as standard.

9.2 Drainage Connections

Foul

The existing connections will be retained / new connections installed subject to agreement with the water company.

Surface Water

100% SUDS Storage on site and connection to soakaway (if found to be suitable) with overflow connection to sewer

9.3a SUDS Calculations & Assumptions

The site is c. 740m².

The existing site discharges 100% unattenuated.

- The scheme results in impermeable areas of a maximum c. 210m² (footprint and minimal hardstanding)
- This is c. 28% of the site.

For the calculations to oversize and future-proof:

- Assume 50% of the site
- This means the scheme will be attenuating for all impermeable areas and a 22% buffer
- Use 40% for climate change
- Use 3 l/s as the lowest suitable restricted discharge(as part of Building Regs Part H) in order to further oversize: as per industry standard: any lower and the smallness of the aperture becomes a flood risk in itself as it would be so easily blocked
- Likely storage of 3.0m³
 - The full output calculation is included in Appendix C

9.3b SUDS Specifications: see Appendix B also

New permeable front parking area:

- Use the front permeable access / parking area = 40.0m²
 - This area is shown on the scaled drawings in Appendix B
- Using just extra 0.35m depth of granular angular storage in the make-up = 12.86m³ of storage using EA specifications:

New permeable surfacing to be constructed using the following EA guidance:

- Use the EA's specific "Guidance on the permeable surfacing of front gardens"

<http://www.communities.gov.uk/publications/planningandbuilding/pavingfrontgardens>

- Additional formal extensive SUDS would not be commensurate with the scale and sensitivity of the scheme.
- Retain all existing porous grassed / planting areas

9.4 Pipe sizes /Manholes / Pipe runs

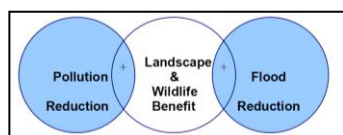
These will be confirmed as part of detailed designs; specifications of landscaping and drainage products need to be confirmed through Buildings Regs. Not required at this stage to demonstrate scheme can accommodate the surface water flows or meet LLFA requirements.

9.5 SUDS Hierarchy Check: site and scheme specific

The scheme offers tangible benefit in that it maximises permeable / porous areas and includes one of the highest forms of discharge: to soakaway.

Concept SUDS Strategy

The following diagram indicates the philosophy behind the proposed SUDS strategy, and is taken from the EA's SUDS guidance:



(Source: Environment Agency, 2009)

Table 2 indicates the SUDS Hierarchy Appraisal for the site and proposed development:

Table 2: Site Specific SUDS Appraisal

SUDS Hierarchy	SUDS Technique	Potential Benefits			Site Specific	
		Flood Reduction	Pollution Reduction	Landscape & Wildlife Benefit	?	Scheme Specific SUDS Suitability Appraisal and Comment
Most Sustainable ↑ ↓ Least Sustainable	Living Roofs	•	•	•	*	To reduce the amount of underground storage SUDS but not likely feasible given nature of build
	Ponds / Basins	•	•	•	X	Site is a single dwelling plot; not necessary
	Swales	•	•	•	X	Site is a single dwelling plot; not necessary
	Infiltration Techniques	•	•		*	Scheme is located in known large chalk area and has the space available to meet the 5.0m easement; hence BRE365 tests are not required at the planning stage as the scheme also has a viable alternative connection to sewer Tests to be undertaken as pre-commencement.
	Permeable and Porous Surfaces with discharge to soakaway / sewer	•	•		✓	The scheme significantly oversizes the SUDS storage on site. Existing connections can be used: utilize soakaway if feasible / restricted overflow to sewer as necessary.
	Tanked Systems	•			*	Incorporated as necessary by drainage strategy to meet and better the LLFA requirements

Key:

Potentially suitable at the site: * Incorporated in the scheme: ✓ Not suitable / possible at the site: X

9.6 Flood Resilience

The proposed development will utilize the flood resilient techniques recommended in the NPPF Technical Guidance where appropriate and also the recommendations that have previously been issued by various local authorities:

The FRA provides the recommended resilient measures that can be incorporated, it will depend on the construction team as to what construction will actually need to be undertaken and what materials are used exactly. This does not invalidate the point and recommendations of this FRA. The FRA cannot simply specify the exact measures that need to be incorporated; they are not required of planning.

- Non-return valves as standard for basement and ground
- Basement to be fully waterproofed (tanked) and waterproofing to be tied in to ground floor slab as appropriate; details to be provided at detailed design to building regulations requirements: to reduce the turnaround time for returning the property to full operation after a flood event.
- Waterproofing to be installed above ground level as appropriate
- Plasterboards will be installed in horizontal sheets on basement and ground levels rather than conventional vertical installation methods to minimise the amount of plasterboard that could be damaged in a flood event
- Wall sockets will be raised to as high as is feasible and practicable in order to minimise damage if flood waters inundate the property
- Any wood fixings on basement and ground floor will be robust and/or protected by suitable coatings in order to minimise damage during a flood event
- Airbricks will be raised to as high as is feasible and practicable
- The Damp Proof Membrane / ground waterproofing will be installed above the main floor slab and tied in to the walls where appropriate, to reduce the turnaround time for returning the property to full operation after a flood event.
- As necessary: the concrete sub floor will likely be laid to fall to drains or gullies which will remove any build-up of ground water to a sump pump where it will be pumped into the mains sewer. This pump will be fitted with a non-return valve to prevent water backing up into the property should the mains sewer become full
- Insulation to the external walls will be specified as rigid board which has impermeable foil facings that are resistant to the passage of water vapour and double the thermal resistance of the cavity.

9.7 Refuge and Evacuation

HAYLING ISLAND EMERGENCY PLANNING FRAMEWORK

EA Flood Warning

Based on the likely flood risk and associated warning time, evacuation is usually preferred and feasible at this site, floodwaters are also not likely to enter the building; refuge is a preferred flood response.

Range of Flood Events

- The site is in EA FZ1
- Not in a breach or wave action extent
- Not in a rapid inundation zone

All site users have access to the first floor, above the extreme event for lifetime of the scheme.

It is therefore considered likely that there would be sufficient time to seek refuge and/or evacuate to an area outside of the extreme flood event for the lifetime of the scheme.

The property itself will be a modern protected and resilient dwelling as a result of the scheme and based on the available mapping is not likely to be inundated hence the site users can remain dry within the property for the duration of the likely flood event.

Site is in FZ1 present day

Future management: Follow Hayling Island Emergency Plan and follow the emergency routes as directed by the EA / emergency services

9.8 Annual Monitoring

It is recommended that tenants should contact the EA on an annual basis to confirm the flood status of the property.

If the flood status has changed, the evacuation and refuge plan should be reviewed and updated by suitable flood risk consultants as appropriate.

9.9 Surface Water Runoff – Flood Risk from the Development

In accordance with the NPPF / NPPG, this FRA also considers the risks posed from the development to surrounding areas.

The scheme is **compliant with LLFA SUDS policy – new oversized SUDS strategy**: maximise porous and permeable areas with >22% extra volume of SUDS storage on site and discharge to soakaway if found to be feasible / restricted overflow to sewer.

The proposals will incorporate new low-water demand devices such that despite no likely increase in peak flow and volume of flow, this can be managed appropriately for the lifetime of the scheme.

Given the small scale of the proposed development it is considered likely that the development will have a negligible effect on surrounding infrastructure. There will not be any significant increase in overland flow from the site.

9.10 Climate Change including New Allowances

The impact of climate change in accordance with the NPPF / PPG is likely to be an increase in the rainfall intensity in the future, which will increase peak storm flows to sewer. The proposed

development will incorporate low flush and reduced water demand showers and toilets, such that the combined flows to sewer are likely to have a negligible impact. It is considered therefore that flows in the future are not likely to have a significant impact, even with an allowance for climate change.

There is unlikely to be an unacceptable impact on the receiving sewers owing to the small scale of the development and the fact that the scheme reduces discharge rates from the site.

The scheme includes new porous / permeable areas to address residual surface water risk and to encourage storage within the site. The PUSH SFRA includes the required climate change tidal extents.

9.11 Flood Storage

It is considered that flood compensation is not required given the footprint is wholly within FZ1 or the future tidal floodplain.

10.0 Exception Test (not required but included for technical support)

Exception Test Criteria	Proposed Development
It must be demonstrated that the development provides wider sustainability benefits to the community that outweigh flood risk, informed by a SFRA where one has been prepared.	Pass. The site is in current EA FZ1. The future tidal climate change flood risk is a residual risk. The scheme: Results in a better protected and flood future-proofed structure than surrounding properties Re-uses an existing brownfield site: sustainable. Scheme includes SUDS to reduce flood risk overall for the lifetime of the scheme. Scheme can operate safely even in the extreme event Appropriate mitigation is flood resilient and resistant measures
A FRA must demonstrate that the development will be safe, without increasing flood risk elsewhere, and, where possible will reduce flood risk overall.	Pass. The site is in current FZ1. The future tidal climate change flood risk is a residual risk. The site is however also in NO- LOW surface water hazard which many sites are not. The scheme: Results in a better protected and flood future-proofed structure than surrounding properties. As long as the flood resilient measures are incorporated, and the future occupiers sign up to the EA flood warning and understand the flood response required, it is considered likely that the proposed development can be constructed and operated safely in flood risk terms, without increasing flood risk elsewhere and is therefore appropriate development in accordance with the NPPF.

12.0 Conclusion

The proposed development is to erect a replacement dwelling with new porous & permeable areas maximized and new SUDS.

- All site users now have access to above the extreme flood level of the lifetime of the scheme
- The residual risks are not unacceptable based on the assessment of the data, site and scheme and as per the PUSH SFRA analysis and guidance

Replacement dwelling: no trigger for objection as scheme is NPPF and EA compliant.

- Site is within and with access to unrestricted FZ1
- Site is within PUSH SFRA climate change extents (no site specific flood levels available)
- Within NO - VERY LOW surface water hazard based on site specific mapping
- REDUCES FLOOD RISK OVERALL
 - Maximise porous and permeable areas
- Resilient and resistant measures
- **Results in better protected and flood future proofed dwelling than existing**

This is categorized as a "More Vulnerable" in FZ1 / PUSH SFRA climate change extents.

- Semantically the Exception Test is not required as per the NPPF guidance
- **Technically however, this assessment considers the Exception Test is passed regardless, based on the site and scheme specifics**

The hazard is a confirmed residual risk in accordance with NPPF (Paragraph: 041 Ref ID: 7-041-20140306); the proposed operation is site and scheme specifically appropriate.

Given the residual risk flood setting, the level, extent and depth of flooding on the site can be managed in terms of resistant and resilient measures and precautionary mitigation measures.

Based on the likely flooding risk and small scale of the proposed development, it is considered that the proposed development can be constructed and continue to be operated safely in flood risk terms, without increasing flood risk elsewhere; it is therefore considered appropriate development in accordance with the NPPF / PPG.

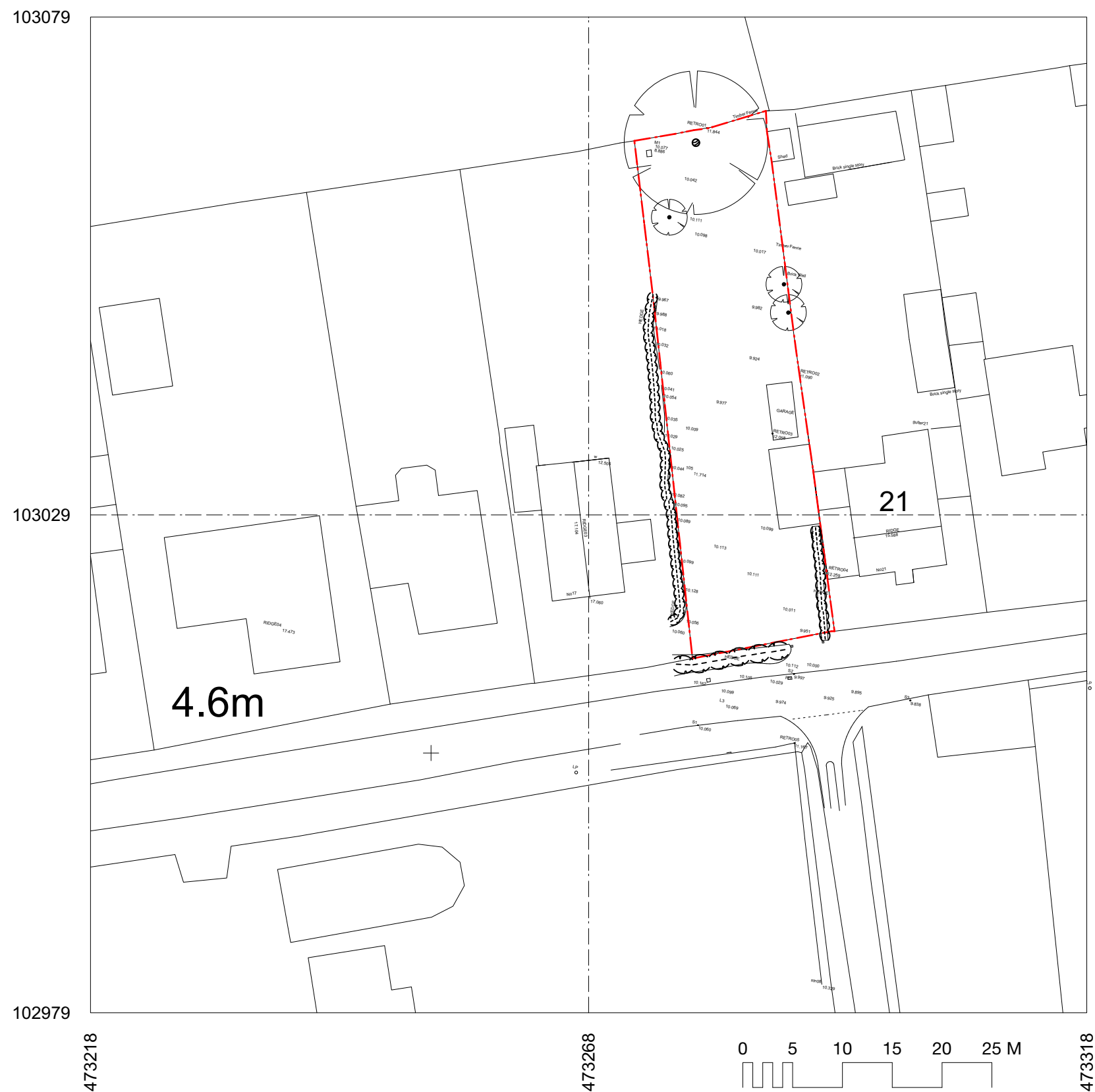
11.1 Recommendations for Further Work

1. Detailed SUDS and drainage designs with BRE365 Testing and specifications as part of detailed design stage to discharge standard condition

12.0 Appendices

- A. Site Location & Existing Layout
- B. Proposed Development Plans & EA Specification for SUDS
- C. SUDS Storage Calculations

Appendix A



Block Plan
scale 1:500



Location Plan

scale 1:1250

REV.:	DATE:	DRWN.:	DESCRIPTION:	INIT.:	

FIGURED DIMENSIONS ONLY TO BE USED © FAITHFULL ARCHITECTS



·
FAITHFULL
·
ARCHITECTS
·

☎ +44 (0)20 7228 0888

PROJECT: 19 St. Peter's Avenue, Hayling Is.

CLIENT: Sam Upton

DRAWING: Location & Block Plans.

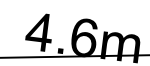
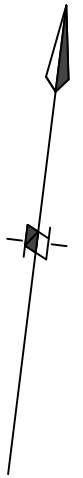
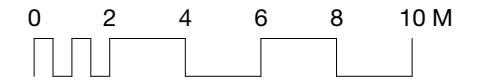
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DATE: July 2020	DRAWING NO. 1018/01	REV.



AERIAL VIEW OF SITE (South)

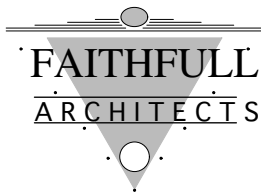


AERIAL VIEW OF SITE (North)



26550mm

ST PETER'S AVENUE

REV	DATE	
REVISIONS		
DRAWINGS NOT TO BE SCALED, FIGURED DIMENSIONS ONLY DRAWINGS NOT TO BE USED FOR LAND TRANSFER PURPOSES DRAWINGS TO BE READ IN CONJUNCTION WITH RELEVANT DRAWINGS AND SPECIFICATIONS		
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CLIENT		
Sam Upton		
PROJECT		
19 St. Peter's Avenue, Hayling Is.		
DRAWING TITLE		
Existing Site Plan.		
SCALE	DATE	
1:200@A3	July 2020	
DRAWN	DRAWING No.	REV
CHECKED	1018/01	

Mr Faithfull
Faithfull Architects
Cottage on the Green
Witherfield Road
Great Wratting
CB9 7HD

Our Ref: APP/20/00888
Direct Line: (023) 9244 6549
Ask For: Mr D Eaves
Email: planning.development@havant.gov.uk
3 December 2020

Dear Mr Faithfull

The Town and Country Planning Act 1990 (as amended)
Town and Country Planning (Development Management Procedure) (England) Order 2015

Site Address: Site of, 19 St Peters Avenue, Hayling Island

Proposed Development: Construction of new dwelling to replace house demolished under Planning Permission 97/61610/000.

I refer to the above planning application and I can confirm that I have now visited the site and reviewed the planning application and consultee responses together with 3rd party representations.

As a result there are a number of matters that are required to be addressed in relation to the proposed development.

Firstly the proposed development is located outside the built up area and as such would represent a **departure** from the Development Plan and the proposal has been advertised as such. Were planning permission to be recommended in relation to the development, the application would need to be determined at the Councils Development Management Committee.

It is noted that the description includes reference to a dwelling that formally occupied the site and was subject to planning permission for demolition under planning reference 97/61610/000. Whilst I note that the letter with your application states that this consent has now lapsed, please can you confirm with any evidence when the original dwelling on the site was demolished, whether any pre-commencement conditions were discharged and whether it is considered that a commencement of development was achieved under the then applicable provisions of the Town and Country Planning Act 1990 Section 56.

In relation to **flood risk** whilst the site is within Flood Zone 1, the extent of future flood zones with climate change for Havant Borough have been mapped in the Partnership for South Hampshire Strategic Flood Risk Assessment. The PUSH SFRA is published as part of the supporting evidence for the emerging Local Plan, and is available at via www.havant.gov.uk/localplan/evidence-base.

The site has been identified as within a future flood zone.

Within the future flood zones it is necessary to provide a Flood Risk Assessment and for a Sequential Test to be carried out.

Guidance is clear that where a Strategic Flood Risk Assessment (SFRA) has been prepared, it should form the basis of the Sequential Test:

"...The flood zones as refined in the Strategic Flood Risk Assessment for the area provide the basis for applying the Test."

and

...“Nor should it normally be necessary to apply the Sequential Test to development proposals in Flood Zone 1 (land with a low probability of flooding from rivers or the sea), unless the Strategic Flood Risk Assessment for the area, or other more recent information, indicates there may be flooding issues now or in the future (for example, through the impact of climate change).”

www.gov.uk/guidance/flood-risk-and-coastal-change#aim-of-Sequential-Test Paragraph: 033
Reference ID: 7-033-20140306

It is consistent with other elements of flood risk guidance to apply the requirement for the sequential test to those areas at risk of flooding in the future.

Please therefore provide a flood risk assessment and information (see below) in relation to the sequential test to allow the Council to carry out a sequential test. It is noted that a basement is proposed for the site including a bedroom and any flood risk assessment would also need to assess the suitability of this feature given the future flood risk identified in the SFRA.

The applicant for any proposal requiring a Sequential Test is expected to assemble the evidence to allow the Council to consider whether the development passes the test.

The council will consider the evidence provided and determine whether it can be concluded that there are no reasonably available alternative sites appropriate for the proposed development in areas with a lower probability of flooding. If it is demonstrated that there are no reasonably available alternative sites, the Sequential Test is deemed to have been passed. At this stage however it is considered to be difficult to demonstrate that the sequential test can be passed as there are clearly other suitable sites outside future flood risk areas on Hayling Island and within the Borough that could be developed. Further details in relation to the evidence required in relation to the sequential test will be sent by separate email.

In relation to the **Habitats Regulations Assessment** there are a number of matters to be addressed.

Firstly the proposal would result in a new dwelling within 5.6km of the SPA and the proposal would be required to complete a unilateral undertaking and provide a financial contribution in relation to the Solent Recreation Mitigation Scheme. For a four bed dwelling this would be £851.45 (including monitoring and Admin). Please confirm your agreement in principle and I will ask for the relevant details to be sent to you for completion.

In relation to nutrient neutrality I note that you have stated that the development would be nutrient neutral or nutrient positive in the Updated European Site Avoidance and Mitigation checklist and completed a nutrient budget. Having checked the calculations the nutrient budget is considered to be incorrect. I will forward a revised draft budget for your consideration and ask that this together with the revised European Site Avoidance checklist be amended and re-submitted.

Details in relation to the Water Efficiency Calculator will be checked in consultation with Building Control.

Once these have been provided a Draft Habitats Regulations Assessment / Appropriate Assessment will be completed in consultation with Natural England.

With regard to the **design and layout** of the proposed dwelling, the mixed nature of St Peters Avenue is noted, however, the current proposal is for a substantial dwelling which compared to the neighbouring properties (as demonstrated by the elevation to the street) would have a greater mass, bulk and width. This is considered to detract for the character and appearance of the area and the development impacts on boundary hedges which are a feature of this semi-rural environment. It is recommended that the dwelling is set off the boundaries to the east and west by 2m.

Finally, and notwithstanding potential problems with the basement in relation to flood risk, I would ask that details of any extract ventilation, fans or pumps etc required in relation to the basement are submitted for consideration in consultation with Environmental Health.

Given the issues highlighted above you may wish to withdraw the current application and if appropriate re-submit a revised application with the additional information. If the current application is to be pursued to a decision we will require an Extension of Time Agreement initially until 15th January 2021. Please confirm your position.

Please note that the above comments are the opinions of a planning officer and are in no way binding upon the Council when determining an application for Planning Permission.

Yours Sincerely



David Eaves
Principal Planner

0 2 3 4 5 M

w

12.505

17.104

RIDGE03

17

17.060

HEDGE

10.128

10.056

10.060

Existing hedge removed
and re-instated

HEDGE

Existing Gate removed

Existing hedge retained

HEDGE

10.011

9.951

10.112

10.000

9.977

10.009

10.035

10.029

10.025

10.044

105

11.714

10.082

10.095

10.089

10.099

10.113

10.111

RETRO04
12.259

RIDGE

15.588

No21

GARAGE

RETRO03
12.058

Existing structures removed

Existing hedge removed

Brick single story

gutter21

REV DATE

REVISIONS

DRAWINGS NOT TO BE SCALED, FIGURED DIMENSIONS ONLY
DRAWINGS NOT TO BE USED FOR LAND TRANSFER PURPOSES
DRAWINGS TO BE READ IN CONJUNCTION WITH RELEVANT
DRAWINGS AND SPECIFICATIONS

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CLIENT

Sam Upton

PROJECT

19 St. Peter's Avenue, Hayling Is.

DRAWING TITLE

Existing Site Plan.

SCALE

1:100@A3

DATE

July 2020

DRAWN

DRAWING No.

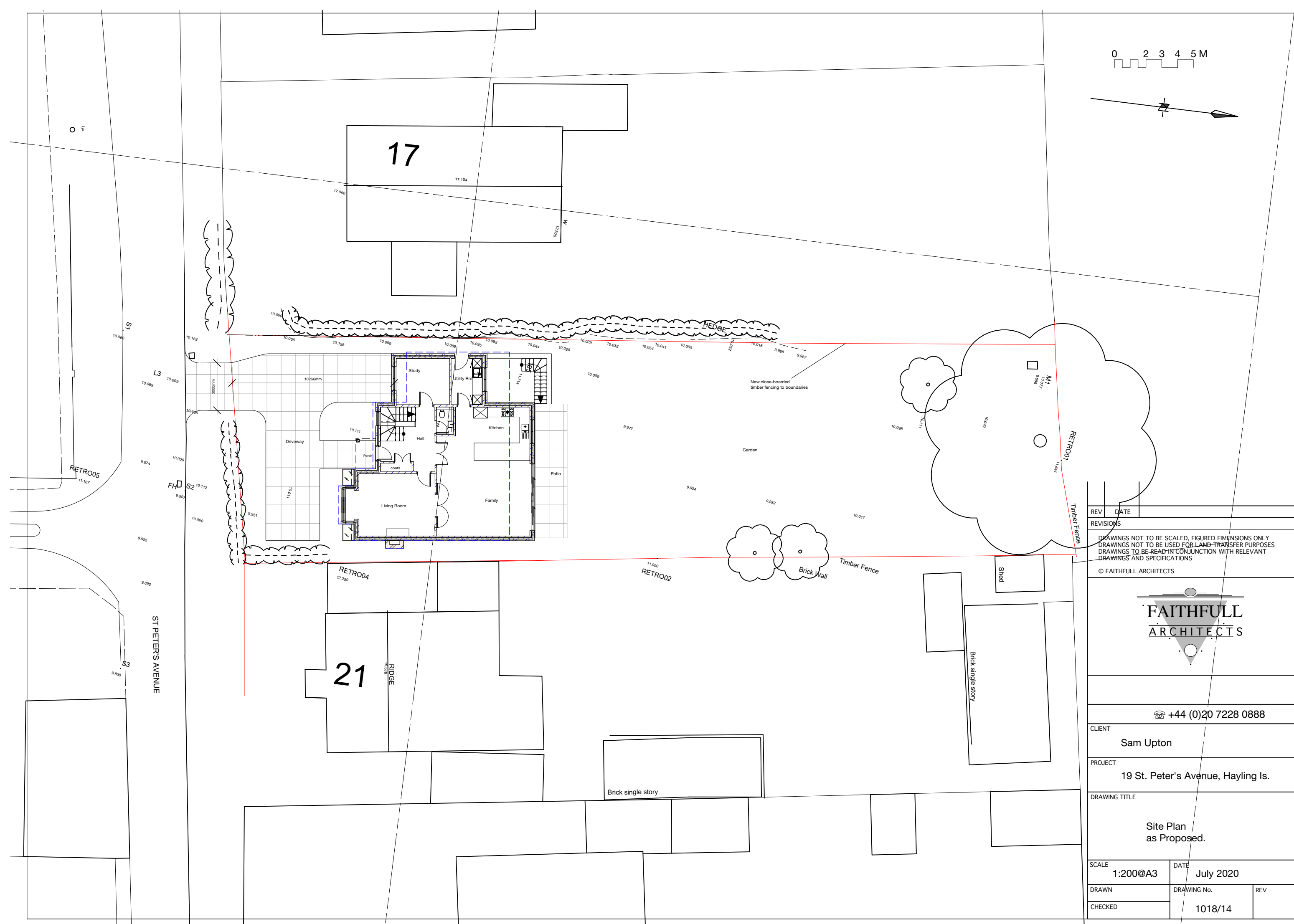
REV

CHECKED

1018/06

ST PETER'S AVENUE

Appendix B



REV	DATE	
REVISIONS		
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CLIENT	Sam Upton	
PROJECT	19 St. Peter's Avenue, Hayling Is.	
DRAWING TITLE	Site Plan / as Proposed.	
SCALE	DATE	
1:200@A3	July 2020	
DRAWN	DRAWING No.	REV
CHECKED	1018/14	

0 2 3 4 5 M

Brick single story

gutter21

Rec Room

Store

Bedroom 5

Sh-room
en suite

Plant

Media/Cinema

Rooflights
over

FFL +7.075m

Patio

105

RIDGE

21

No21

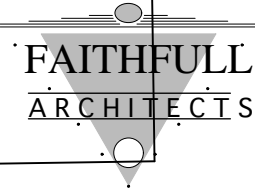
RETRO04
12.259

HEDGE

1200mm

1000mm

ST PETER'S AVENUE

REV	DATE	
REVISIONS		
DRAWINGS NOT TO BE SCALED, FIGURED DIMENSIONS ONLY DRAWINGS NOT TO BE USED FOR LAND TRANSFER PURPOSES DRAWINGS TO BE READ IN CONJUNCTION WITH RELEVANT DRAWINGS AND SPECIFICATIONS © FAITHFULL ARCHITECTS		
		
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CLIENT Sam Upton		
PROJECT 19 St. Peter's Avenue, Hayling Is.		
DRAWING TITLE Basment Plan.		
SCALE 1:100@A3		DATE July 2020
DRAWN	DRAWING No.	
CHECKED	1018/07	
		REV

0 2 3 4 5 M

Outline of previous house scheme, shown in blue.

Brick single story

gutter21

window

window

REV DATE

REVISIONS

DRAWINGS NOT TO BE SCALED, FIGURED DIMENSIONS ONLY
DRAWINGS NOT TO BE USED FOR LAND TRANSFER PURPOSES
DRAWINGS TO BE READ IN CONJUNCTION WITH RELEVANT
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CLIENT

Sam Upton

PROJECT

19 St. Peter's Avenue, Hayling Is.

DRAWING TITLE

Ground Floor Plan.

SCALE
1:100@A3

DATE
July 2020

DRAWN

DRAWING No.

REV

CHECKED

1018/08

21

No21

RETRO04
12.259

RIDGE
15.588

Walk-on glass
skylights

ST PETER'S AVENUE

9.977

10.009

10.035

10.029

10.025

10.044

11.714

10.082

10.095

Utility Rm

WC

Study

Hall

FFL +10.225m

coats

Living Room

Porch

10.111

HEDGE

10.099

102mm

10.128

10.056

10.060

1000mm

10266mm

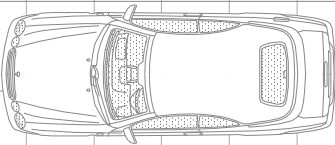
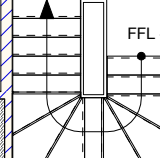
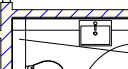
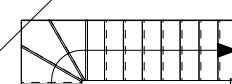
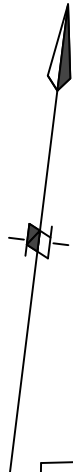
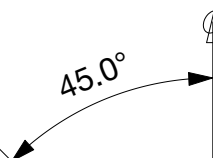
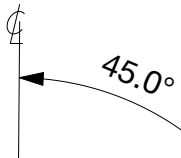
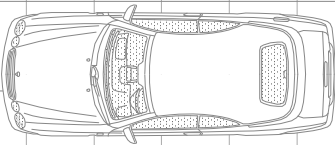
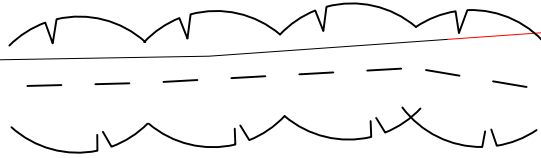
3000mm

9.951

1200mm

10.112

10.000



12.505

17.104

RIDGE03

17.060

w

17

0 2 3 4 5 M

Brick single story

gutter21

105
11.714

Bedroom 3

Bedroom 1

Dressing

Sh-room
en suite

Bathroom

Bedroom 2

Under-eaves
storage

FFL +13.075m

RIDGE
15.588

21

No21

RETRO04
12.259

1200mm

HEDGE

1000mm

ST PETER'S AVENUE

REV	DATE	
REVISIONS		
DRAWINGS NOT TO BE SCALED, FIGURED DIMENSIONS ONLY DRAWINGS NOT TO BE USED FOR LAND TRANSFER PURPOSES DRAWINGS TO BE READ IN CONJUNCTION WITH RELEVANT DRAWINGS AND SPECIFICATIONS © FAITHFULL ARCHITECTS		
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CLIENT Sam Upton		
PROJECT 19 St. Peter's Avenue, Hayling Is.		
DRAWING TITLE First Floor Plan.		
SCALE 1:100@A3		DATE July 2020
DRAWN	DRAWING No.	
CHECKED	1018/09	
		REV

0 2 3 4 5 M

Brick single story

gutter21

105
11.714

RIDGE03

RIDGE

21

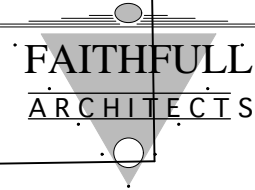
No21

RETRO04
12.259

HEDGE

1000mm

1200mm

REV	DATE
REVISIONS	
DRAWINGS NOT TO BE SCALED, FIGURED DIMENSIONS ONLY DRAWINGS NOT TO BE USED FOR LAND TRANSFER PURPOSES DRAWINGS TO BE READ IN CONJUNCTION WITH RELEVANT DRAWINGS AND SPECIFICATIONS © FAITHFULL ARCHITECTS	
	
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PROJECT 19 St. Peter's Avenue, Hayling Is.	
DRAWING TITLE Roof Plan.	
SCALE 1:100@A3	DATE July 2020
DRAWN	DRAWING No. 1018/10
CHECKED	REV

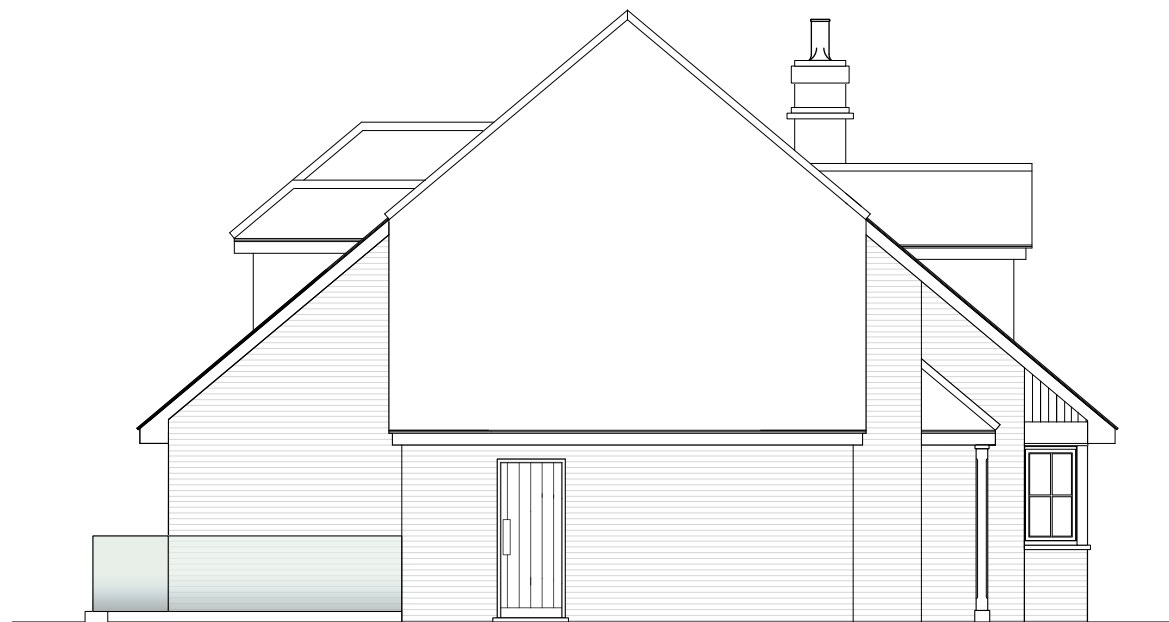
ST PETER'S AVENUE



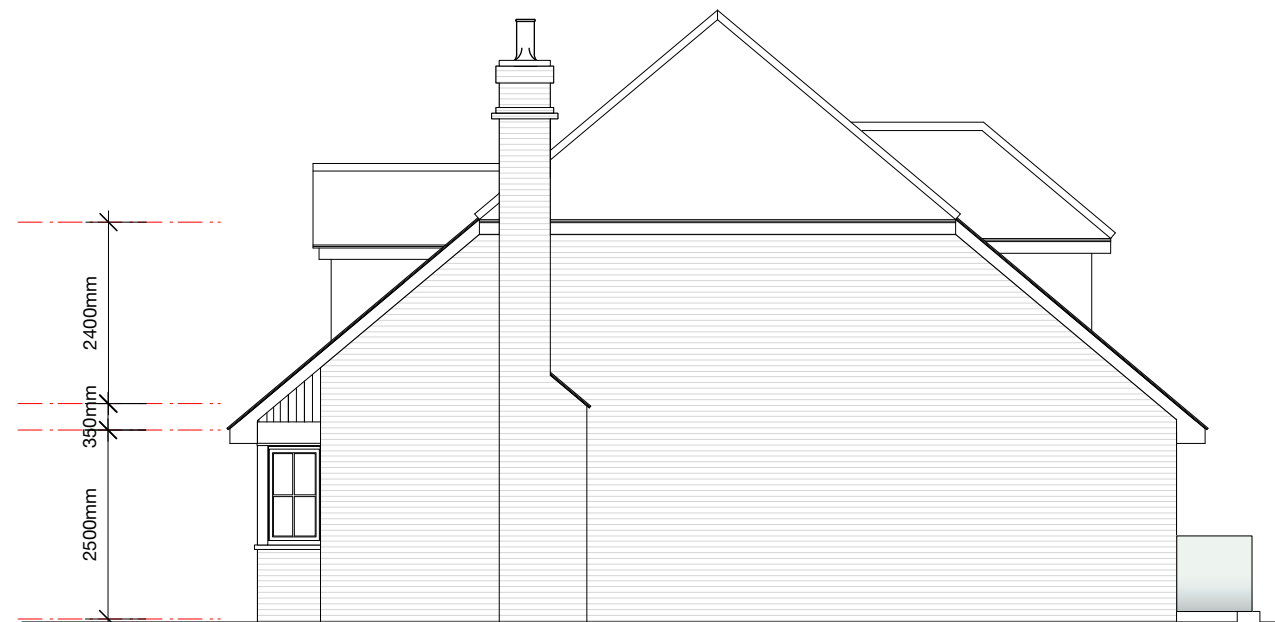
South Elevation



North Elevation



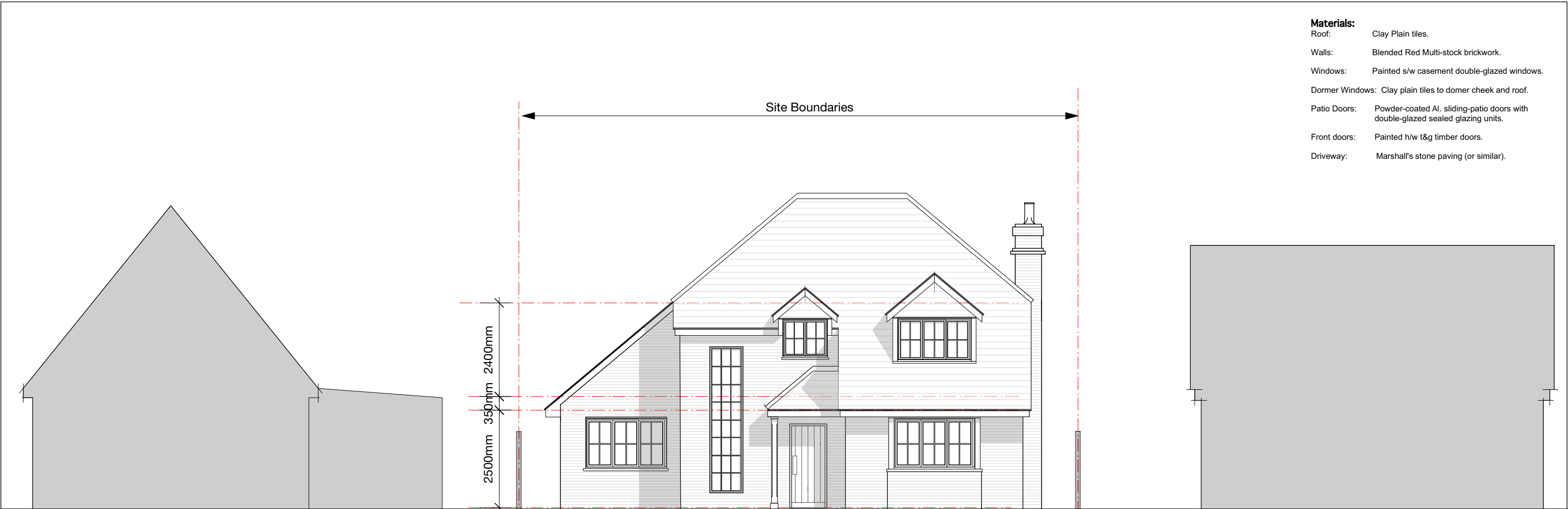
West Elevation



East Elevation

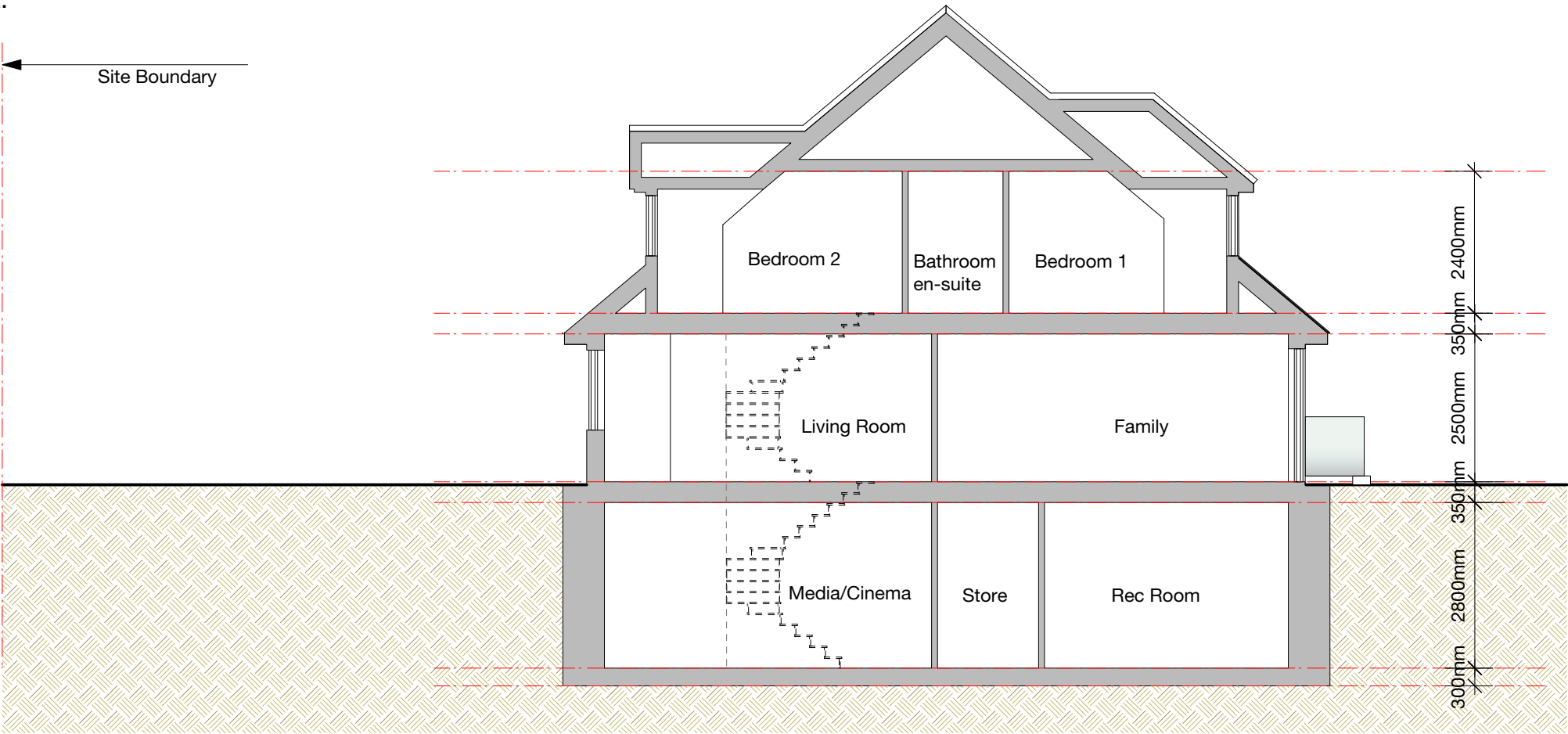
REV	DATE	
REVISIONS		
DRAWINGS NOT TO BE SCALED, FIGURED DIMENSIONS ONLY DRAWINGS NOT TO BE USED FOR LAND TRANSFER PURPOSES DRAWINGS TO BE READ IN CONJUNCTION WITH RELEVANT DRAWINGS AND SPECIFICATIONS © FAITHFULL ARCHITECTS		
		
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CLIENT		
Sam Upton		
PROJECT		
19 St. Peter's Avenue, Hayling Is.		
DRAWING TITLE		
Elevations		
SCALE		DATE
1:100@A3		August 2020
DRAWN		DRAWING No.
CHECKED		1018/11
		REV

- Materials:**
- Roof: Clay Plain tiles.
 - Walls: Blended Red Multi-stock brickwork.
 - Windows: Painted s/w casement double-glazed windows.
 - Dormer Windows: Clay plain tiles to domer cheek and roof.
 - Patio Doors: Powder-coated Al. sliding-patio doors with double-glazed sealed glazing units.
 - Front doors: Painted h/w t&g timber doors.
 - Driveway: Marshall's stone paving (or similar).



Elevation to Street.

Site Boundary



Section A-A.

REV	DATE	
REVISIONS		
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CLIENT		
Sam Upton		
PROJECT		
19 St. Peter's Avenue, Hayling Is.		
DRAWING TITLE		
Front Elevation to St. Peter's Ave. & Section A-A.		
SCALE		DATE
1:100@A3		August 2020
DRAWN	DRAWING No.	
CHECKED	1018/12	
		REV

Appendix C



Surface water storage requirements for sites

www.uksuds.com | Storage estimation tool

Calculated by:

Site name:

Site location:

Site Details

Latitude:

Longitude:

Reference:

Date:

This is an estimation of the storage volume requirements that are needed to meet normal best practice criteria in line with Environment Agency guidance "Rainfall runoff management for developments", SC030219 (2013), the SuDS Manual C753 (Ciria, 2015) and the non-statutory standards for SuDS (Defra, 2015). It is not to be used for detailed design of drainage systems. It is recommended that hydraulic modelling software is used to calculate volume requirements and design details before finalising the design of the drainage scheme.

Site characteristics

Total site area (ha):	0.074
Significant public open space (ha):	0
Area positively drained (ha):	0.074
Impermeable area (ha):	0.037
Percentage of drained area that is impermeable (%):	50
Impervious area drained via infiltration (ha):	0
Return period for infiltration system design (year):	10
Impervious area drained to rainwater harvesting (ha):	0
Return period for rainwater harvesting system (year):	10
Compliance factor for rainwater harvesting system (%):	66
Net site area for storage volume design (ha):	0.07
Net impermeable area for storage volume design (ha):	0.04
Pervious area contribution to runoff (%):	30

* where rainwater harvesting or infiltration has been used for managing surface water runoff such that the effective impermeable area is less than 50% of the 'area positively drained', the 'net site area' and the estimates of Q_{BAR} and other flow rates will have been reduced accordingly.

Design criteria

Climate change allowance factor:

Urban creep allowance factor:

Volume control approach:

Interception rainfall depth (mm):

Minimum flow rate (l/s):

Methodology

esti:

Q_{BAR} estimation method:

SPR estimation method:

Soil characteristics

	Default	Edited
SOIL type:	3	3
SPR:	0.37	0.37

Hydrological characteristics

	Default	Edited
Rainfall 100 yrs 6 hrs:	--	63
Rainfall 100 yrs 12 hrs:	--	94.71
FEH / FSR conversion factor:	1.23	1.23
SAAR (mm):	704	704
M5-60 Rainfall Depth (mm):	20	20
'r' Ratio M5-60/M5-2 day:	0.4	0.4
Hydrological region:	7	7
Growth curve factor 1 year:	0.85	0.85
Growth curve factor 10 year:	1.62	1.62
Growth curve factor 30 year:	2.3	2.3
Growth curve factor 100 years:	3.19	3.19
Q_{BAR} for total site area (l/s):	0.21	0.21
Q_{BAR} for net site area (l/s):	0.21	0.21

Site discharge rates

	Default	Edited
1 in 1 year (l/s):	3	3
1 in 30 years (l/s):	3	3
1 in 100 year (l/s):	3	3

Estimated storage volumes

	Default	Edited
Attenuation storage 1/100 years (m^3):	11	11
Long term storage 1/100 years (m^3):	0	0
Total storage 1/100 years (m^3):	11	11

This report was produced using the storage estimation tool developed by HRWallingford and available at www.uksuds.com. The use of this tool is subject to the UK SuDS terms and conditions and licence agreement, which can both be found at <http://uksuds.com/terms-and-conditions.htm>. The outputs from this tool have been used to estimate storage volume requirements. The use of these results is the responsibility of the users of this tool. No liability will be accepted by HR Wallingford, the Environment Agency, CEH, Hydrosolutions or any other organisation for the use of these data in the design or operational characteristics of any drainage scheme.