

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

Our ref: HA/2020/122717/01-L01
Your ref: APP/20/00801
Date: 26 November 2020

Dear Sir/Madam

ERECTION OF 1NO. TWO BED DWELLING TO REAR OF 31 NORTH CRESCENT, WITH ACCESS FROM NORMAN ROAD - AMENDMENTS TO APPROVED DWELLING (APP/19/00726)

31 NORTH CRESCENT, HAYLING ISLAND, PO11 9LR

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

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(s)

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 needs to:

- Take the impacts of climate change for the lifetime of the site into account. The FRA needs to assess of the impact of climate change using appropriate climate change allowances:
 - Assess the proposed finished floor levels including an appropriate freeboard with the 1 in 200 year return period plus climate change tidal flood levels for the lifetime of the development.
- Ensure flood risk mitigation measures for the lifetime of the site are adequate and make the development resilient to all extreme flood levels including:
 - Safe access and egress routes
 - Considering how people will be kept safe from the identified flood hazards
 - Considering the requirement for flood emergency planning including

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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evacuation of people for a range of flooding events up to and including extreme events

Overcoming our objection

To overcome our objection, the applicant should submit an FRA which demonstrates that the development is not at risk of tidal flooding for the lifetime of the development. The applicants submitted FRA information states that the climate change maps have been checked and the development remains in Flood Zone 1. This is incorrect as the Environment Agency does not have these maps, we only have maps showing the latest flood extents from its models.

When considering the impacts of climate change there is guidance specific to planning which can be found at <https://www.gov.uk/guidance/flood-risk-assessments-climate-change-allowances>. Applying these allowances will result in future flood levels higher than current flood levels.

The latest tidal flood levels from our models can be obtained by requesting a free Product 4 from our enquiries team on SSDEnquiries@environment-agency.gov.uk. Please provide a detailed map in your request of data for the proposed site

Even though the actual development is not in Flood Zone 2 or Flood Zone 3, it is right on the boundary of the 2018 East Solent Flood Model. With climate change allowances included for the lifetime of the development, the development will be at risk of flooding.

Therefore, detailed information of the 1 in 200 year return period tidal flood levels plus climate change allowances compared with the sites ground levels and the proposed finished floor levels should be provided. An appropriate freeboard should also be applied to the finished floor levels to keep the occupants safe for the lifetime of the development.

We ask to be re-consulted with the results of an FRA. We will provide you with bespoke comments within 21 days of receiving formal re-consultation. Our objection will be maintained until an adequate FRA has been submitted.

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

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.

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

Charged advice service

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.

Should you have any further queries please do not hesitate to contact me.

Yours faithfully

Mrs Sophie Brown
Sustainable Places Planning Advisor

Direct dial 02030 257250

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

cc Martin Critchley, Architect