

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

Our ref: HA/2020/122401/02-L01
Your ref: APP/20/00533

Date: 29 October 2020

Dear Sir/Madam,

AMENDED FLOOD RISK ASSESSMENT - PROPOSED DEMOLITION OF EXISTING INDUSTRIAL UNIT IN FAVOUR OF A NEW REPLACEMENT UNIT FOR B1, B2 AND B8 USE

B.M. SCAFFOLDING, BROCKHAMPTON ROAD, HAVANT, PO9 1JU

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

We request that the following condition be attached to any planning permission granted, and that the details in relation to the condition be submitted and approved by the Local Planning Authority.

Condition

The development shall be carried out in accordance with the submitted flood risk assessment (ref "FRA – 2019 – 000002", titled "*Flood Risk Assessment*", Revision No. 2, and dated 26/08/2020) and the following mitigation measures it details:

- [14.2.1] Finished Floor Levels: Finished floor levels shall be set no lower than 5.3 metres above Ordnance Datum (AOD)
- [14.2.2] Flood displacement storage: Compensatory storage shall be provided through use of under floor voids.
- [14.2.2] All development within Flood Zone 3 must not result in a net loss of flood storage capacity
- [14.2.2] Maintenance and clearance of the underfloor voids should be undertaken regularly to assure the effective use of the underfloor as flood storage

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

To reduce the risk of flooding to the proposed development and future occupants.

To prevent flooding elsewhere by ensuring that compensatory storage of flood water is provided.

The condition is in line with the Planning Practice Guidance (PPG) to the National Planning Policy Framework (NPPF) for Flood Risk and Coastal Change.

Note to the Local Planning Authority/Applicant

Climate Change Flood Levels

The Applicant has used the 1 in 1000yr flood height as the climate change adjusted design flood level for this development. This is contrary to the usual climate assessment made by adjusting existing 1 in 100yr flood heights using the [climate change allowances online](#).

In this instance, although a basic assessment of future flood risk, we will accept this as the design flood level in the absence of 1 in 100yr flood levels with climate change allowances. This is due to the commercial nature of the development and as such a lower vulnerability according to NPPG. Were any future development or change of use to occur at this site we would expect a full assessment of the flood height for the design life of the development with appropriate climate change allowances.

It is for the Local Planning Authority to decide if this is an appropriate assessment of future flood risk and if the vulnerability of proposal justifies the approach.

Flood Plain Storage Compensation

In the absence of space for flood plain storage compensation and thus level for level compensation in areas outside of the flood plain, the use of under floor voids in this instance can be deemed acceptable. As the development will take place within 8m of a Statutory Main River the works will be subject to regulation through a Flood Risk Activity Permit. Whilst details regarding the precise nature and volumes of flood storage are lacking within the submitted FRA we are happy to see the matter of flood storage compensation addressed in detail through the Flood Risk Activity Permitting Process. We would expect to see precise calculations detailing that there will be no net loss of flood storage.

Finally, with regards to the voids, for these to be considered an acceptable form of compensation it is important that the conditioned reference to the regular maintenance and clearance of the voids is sustained throughout the lifetime of the development. Failure to do so would make the void's redundant and increase flood risk to people and property elsewhere.

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 would like to find out more about reducing flood damage, please visit the Flood Risk and Coastal Change pages of the Planning Practice Guidance (<https://www.gov.uk/guidance/flood-risk-and-coastal-change>).

The following document may also be useful:

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 - 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.

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 02030 257250

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