

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

**Our ref:** HA/2020/122426/02-L01  
**Your ref:** APP/20/00547  
**Date:** 15 September 2020

Dear Sir/Madam

**FRA SUBMITTED - VARIATION OF CONDITION 4 OF PLANNING PERMISSION  
15465/003 TO ALLOW FOR RESIDENTIAL USE FROM 1ST MARCH TO 31ST  
DECEMBER. 133 EASTOKE AVENUE, HAYLING ISLAND, PO11 9QR**

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**

Following a review of the submitted Flood Risk Assessment we are now able to remove our objection to this application. Although it is lacking in detail especially with regard to ground levels, flood depths and proposed mitigation measures, we are satisfied that it does enough to acknowledge the risk for the variation of this condition. Please be aware that the Environment Agency would resist any move to permanent occupancy of a caravan or mobile home at this site.

**Advice to LPA**

The current 1 in 200 year tide level (Flood Zone 3 extent) is given as 3.4mAOD and this rises to 4.5mAOD by the year 2115, when the impacts of climate change and sea level rise are considered. Environment Agency data indicates that ground levels at the site are between 2.4 and 2.8mAOD.

The FRA submitted has not considered ground levels in relation to flood depths and the vulnerability of the mobile home to internal flooding itself and mitigation relies predominantly on the existing flood defences. Coastal defences are likely to defend the site against the current 1 in 200 year tide level (3.4mAOD), but future flooding of the site will become increasingly likely as sea levels are predicted to rise with climate change.

Environment Agency  
Guildbourne House Chatsworth Road, Worthing, West Sussex, BN11 1LD.  
Customer services line: 03708 506 506  
[www.gov.uk/environment-agency](http://www.gov.uk/environment-agency)

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The Environment Agency will resist any move to permanent occupancy of a caravan or mobile home at this site. The structures' instability places their occupants at high risk, if they are likely to be occupied during periods when flood risk may be higher, and permanent occupancy can lead to a progression to permanent housing, which is contrary to both national and local planning policy.

We have no objection to an extension of the occupancy period, providing you are happy that it accords with Local Plan Policy DM4 and that you, as the relevant authority in emergency response and rescue are satisfied that there are suitable flood risk management methods, such as a Flood Warning and Evacuation Plan, in place.

### **Flood Warning and Evacuation Plan (FWEP)**

We suggest that a FWEP is submitted and that the applicant signs up to the Environment Agency's flood warning service. The LPA will need to consider if this information and the mitigation measures it demonstrates are appropriate given the residual flood risk to the site. Please be aware that the Environment Agency does not normally comment on or approve the adequacy of flood emergency and evacuation procedures accompanying development proposals, as we do not carry out these roles during a flood. Our involvement with this development during an emergency will be limited to delivering flood warnings to occupants/users.

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](mailto:planningSSD@environment-agency.gov.uk)