

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

Our ref: HA/2019/121827/01-L01
Your ref: APP/19/01131
Date: 17 December 2019

Dear Sir/Madam

**USE OF LAND FOR TOURING HOLIDAY/TOURISM CARAVAN SITE AND
ERECTION OF UTILITY BLOCK (RESUBMISSION). LAND ADJACENT TO
MANDAI, ST PETERS ROAD, HAYLING ISLAND**

Thank you for the consultation on the above application, please quote our reference on all correspondence.

We have reviewed the information as submitted and have the following comments.

Environment Agency position

The Environment Agency has **no objection** to the proposal from a flood risk perspective as resubmitted.

Advice to LPA

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 due consideration by the Local Planning Authority is given to the issues below and consultation be undertaken with the relevant experts where necessary. Issues are:

Adequacy of rescue or evacuation arrangements

The applicant has demonstrated through the FRA that they understand the requirement for flood emergency planning including flood warning and evacuation of people. A Flood Warning and Evacuation Plan was not submitted with this application however the applicant is prepared to produce this. The FRA comments that the evacuation plan would involve towing the touring caravans off the site. However, this may not be possible due to the potential lack of access to the site during an extreme flood event. The potential lack of access should be addressed through a site specific flood management plan which would need to be agreed with the LPA. The Environment Agency does not normally comment on or approve the adequacy of

flood emergency response 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 covered by our flood warning network.

The Planning Practice Guidance to the National Planning Policy Framework (NPPF) for Flood Risk and Coastal Change states that those proposing developments should take advice from the emergency services when producing an evacuation plan for the development as part of the flood risk assessment.

- Provision of and adequacy of a temporary refuge

The FRA states that during an extreme event, guests would potentially have suitable shelter on the site as the proposed hardstanding areas for the three caravans are to be located in Flood Zone 1 which has a low annual probability of river and sea flooding. The LPA should consider whether the proposed location of the caravans can provide suitable shelter until flooding on the road frontage has fallen to a safe level.

The Environment Agency can provide the following information on the characteristics of flooding at this site to help with your decision:

The FRA uses extreme tide levels taken from the Chichester District Council Strategic Flood Risk Assessment (SFRA). The FRA states that the extreme tide level is predicted to rise to 3.67mAOD but does not state which return period this estimate is for. On review of the SFRA, the extreme tide level of 3.67mAOD is for the 1 in 100 year return event. Flood Zone 3 is assessed as land as having a 1 in 200 or greater annual probability of sea flooding. Therefore flood levels should be assessed against the 1 in 200 return period. The Chichester District Council SFRA shows that the extreme tide level for the 1 in 200 year return period is estimated to be 3.83mAOD, this is consistent with Environment Agency tide level data which is estimated at 3.8mAOD. According to the FRA, existing ground levels for the site are at 3.7mAOD. If the flood extent were to reach the caravans, the ground where the caravans are proposed to be placed could be exposed to around 100mm of flooding. On consideration of the information provided by the FRA and Environment Agency data available; the area of hard standing where the touring caravans will be located is in Flood Zone 1. The probability of flooding on this part of the site is therefore low (less than 1 in 1,000 annual probability of river or sea flooding).

The FRA states that there is a small section of road frontage, including part of the front boundary which falls within Flood Zones 2 and 3. Access to and from the site is directly from St Peter's Road which could become impassable during a flood. St Peter's Road is at a level of approximately 3.3mAOD. The current day 1 in 200 year tide level is given as 3.3mAOD, this is estimated to rise to around 3.8mAOD in the year 2070. Based on this information, over the lifetime of the development (60 years for commercial), the road frontage and entrance to the site could be exposed to flood levels of around 500mm.

If the LPA is not satisfied, taking into account all relevant considerations, that the proposed development can be considered safe without the provision of safe access and exit then planning permission should be refused.

Advice to Applicant

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 on the number below should you have any queries on the above information.

Yours faithfully

Mrs Sophie Brown
Sustainable Places Planning Advisor

Direct dial 02030 257250
Direct e-mail planningSSD@environment-agency.gov.uk