

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

Our ref: HA/2019/121575/02-L01
Your ref: APP/19/00781
Date: 27 January 2020

Dear Sir or Madam,

GARAGE CONVERSION TO ANNEXE. EXTERNAL ALTERATIONS TO MAIN DWELLING.

SEACREST, GUTNER LANE, HAYLING ISLAND, PO11 0RN.

Thank you for consulting the Environment Agency on the above application following the submission of a Flood Risk Assessment (FRA).

We have reviewed the information as submitted and set out our position and comments below.

Environment Agency position

As this development poses an unacceptable risk to life and property from flooding, we **object** to this application and recommend that planning permission is refused.

Reasons

The site lies within Flood Zone 3a, which is land defined by the Planning Practice Guidance (PPG) to the National Planning Policy Framework (NPPF) as having a high probability of flooding. Notwithstanding the mitigation measures proposed, the risk to life and/or property from tidal inundation would be unacceptable if the development were to be permitted.

The application does not demonstrate that occupants can remain safe for the lifetime of the development when allowances for climate change are taken into consideration. There is insufficient flood risk mitigation up to the design flood level, and the specified arrangements for safe access and egress require scrutiny.

Overcoming our objection

To overcome our objection, the Applicant should submit evidence to demonstrate that the proposal will not pose a risk to life as highlighted above. If this cannot be achieved, we are likely to maintain our objection.

Please re-consult us on any revised FRA, and we will respond within 21 days of receiving it.

Advice to the Local Planning Authority

Flood warning and emergency response

The Applicant has shown in their FRA that the expected flood scenario with climate change allowances would lead to inundation with depths up to 2.18m. This level of flooding would be extremely hazardous to the occupants. As this development is a single story property with no internal area for refuge, this poses an unacceptable risk. The Applicant has stated they will seek refuge in the adjacent property, however given the potential depths of the flood waters around the property and the higher velocities associated with tidal flooding, there is still a considerable hazard posed to the occupants.

The Environment Agency/Defra R&D Technical Report FD2320/TR2 specifies that flood depths of this magnitude would present a danger for all, including the emergency services. Rescue would therefore be extremely hazardous. Furthermore, the Applicant has not assessed in their FRA how the structure will be resilient to flood depths of up to 2.18m. It would be for you to be satisfied that the structure was built to withstand the predicted flood depths, so as not to pose a risk to property or life.

We do 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 PPG to the NPPF states that, in determining whether a development is safe, the ability of residents and users to safely access and exit a building during a [design flood](#), and to evacuate before an extreme flood, needs to be considered. One of the key considerations to ensure that any new development is safe is whether adequate flood warnings would be available to people using the development.

In all circumstances where warning and emergency response is fundamental to managing flood risk, we advise Local Planning Authorities to formally consider the emergency planning and rescue implications of new development in making their decisions. As such, we recommend you consult with your emergency planners and the emergency services to determine whether the proposals are safe in accordance with the guiding principles of the PPG.

Our objection

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

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.

Please do not hesitate to contact me using the contact details shown below should you have any queries regarding the above information relating to this application ref: APP/19/00781.

Yours faithfully,

Miss Anna Rabone
Sustainable Places Advisor

Direct dial: 02077 140525

Email: anna.rabone@environment-agency.gov.uk