

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

Our ref: HA/2019/121588/03-L01
Your ref: APP/19/00802
Date: 06 November 2019

Dear Sir/Madam

ADDITIONAL DOCS AND PLANS - ERECTION OF MODULAR CLAD PORTABLE BUILDING FOR HEALTH AND WELLNESS ACTIVITIES THE LANGSTONE HOTEL, NORTHNEY ROAD, HAYLING ISLAND, PO11 0NQ

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

In the absence of an acceptable flood risk assessment (FRA) we object to this application and recommend that planning permission is refused.

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 fails to:

- **take the impacts of climate change into account**
 - There is no assessment of the impact of climate change using appropriate climate change allowances ['Flood risk assessments: climate change allowances'](#)
 - Flood risk mitigation measures to address flood risk for the lifetime of the development included in the design are inadequate because they will not make the development resilient to the flood levels for the lifetime of the development. Consequently the development proposes inadequate:
 - Maintenance of flood alleviation
 - Raised finished floor levels

- Resistance and resilience measures
- Safe access and egress routes

This application fails to incorporate any climate change allowances, therefore failing to show that the development will be safe for its lifetime. Please see our advice below about accessing sources of information that will facilitate the incorporation of predicted flood levels and CC allowances.

Whilst the current proposed development has been moved out of current day flood zones it is likely to be in an area at risk of flooding when climate change allowances are considered. We would expect finished floor levels to be 300mm above the ground level with a consideration of climate change flood levels written into the FRA.

Likewise, climate change allowances should be taken into consideration when planning safe access and egress routes. This should be included in the FRA.

Overcoming our Objection

To overcome our objection, the applicant should submit a revised FRA which addresses the impacts of climate change, specifically related to the FFLs of the proposed development and the impacts on safe access and egress routes.

If this cannot be achieved, we are likely to maintain our objection. Please re-consult us on any revised FRA submitted and we'll respond within 21 days of receiving it.

Advice to Applicant

We do not prepare or provide FRAs. However, our Customers and Engagement teams can provide any relevant flood risk information that we have available (including climate change data). Please contact SSDEnquiries@environment-agency.gov.uk and ask for a Product 4 including climate change levels and allowances.

Your local planning authority should have undertaken a Strategic Flood Risk Assessment (SFRA) which will also include local flood risk information to inform your FRA. Please contact your local planning authority to determine what information is available. Further advice on what to include in an FRA can be found at <https://www.gov.uk/guidance/flood-risk-and-coastal-change#site-specific-flood-risk-assessment-all>

The applicant/occupants should phone Floodline on 0345 988 1188 to register for a flood warning, or visit <https://www.gov.uk/sign-up-for-flood-warnings>. It's a free service that provides warnings of flooding from rivers, the sea and groundwater, direct by telephone, email or text message. Anyone can sign up.

Flood warnings can give people valuable time to prepare for flooding – time that allows them to move themselves, their families and precious items to safety. Flood warnings can also save lives and enable the emergency services to prepare and help communities.

For practical advice on preparing for a flood, visit <https://www.gov.uk/prepare-for-flooding>.

To get help during a flood, visit <https://www.gov.uk/help-during-flood>.
For advice on what to do after a flood, visit <https://www.gov.uk/after-flood>.

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