

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

Our ref: HA/2020/122426/01-L01
Your ref: APP/20/00547

Date: 06 August 2020

Dear Sir/Madam

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 which we received on 17 July 2020.

Environment Agency Position

In the absence of a Flood Risk Assessment (FRA) we **object** to this application for the variation of a condition as the site falls into a flood risk vulnerability category that is inappropriate to the Flood Zones 2 and Flood Zones 3 in which it is located and no adequate assessment of risk or proposed mitigation has been submitted in support.

The entire site is at high probability of flooding by the year 2115.

We recommend that the application should be refused planning permission on this basis.

Reason(s)

The absence of a Flood Risk Assessment (FRA) means this application does not comply with the requirements set out in paragraph Section 9 & 10 of the Planning Practice Guidance for Flood Risk and Coastal Change.

In addition to the lack of a warning and evacuation plan, the flood risk across the site has not been identified for the lifetime of the proposed development. The FRA will need to comply with the requirements for site-specific flood risk assessments that adequately assesses the flood risks posed by the development.

In particular, the FRA needs to:

- Take the impacts of climate change for the lifetime of the site into account. The FRA needs to assess of the impact of climate change using appropriate climate change allowances:

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

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- Assess the caravan finished floor levels with the 1 in 200 year return period plus climate change tidal flood levels
- Ensure flood risk mitigation measures for the lifetime of the site are adequate and make the development resilient to all extreme flood levels including:
 - Safe access and egress routes
 - Considering how people will be kept safe from the identified flood hazards
 - Considering the requirement for flood emergency planning including evacuation of people for a range of flooding events up to and including extreme events

Notwithstanding the above, the site cannot be classed as 'more vulnerable' without an adequate site specific warning and evacuation plan.

Overcoming our Objection

The Environment Agency will resist any move to permanent (or near permanent) occupancy of a caravan or mobile home at this site. The structures' instability places their occupants at special risk, they are likely to be occupied during periods when flood risk may be higher, and permanent (or near permanent) occupancy can lead to a progression to permanent housing. The NPPF is clear that highly vulnerable developments are not compatible with the high probability of flooding possible in Flood Zones 2 and 3.

Detailed information relating to anticipated flood depths including climate change across the site and the caravans finished floor levels should be provided. When considering the impacts of climate change there is guidance specific to planning which can be found at <https://www.gov.uk/guidance/flood-risk-assessments-climate-change-allowances>. Applying these allowances will result in future flood levels higher than current flood levels.

The applicant can request a free Product 4 that provides current tidal flood levels from our enquiries team on SSDEnquiries@environment-agency.gov.uk.

Advice to Local Planning Authority / Applicant

We do not 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 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 could be made safe in accordance with the guiding principles of the Planning Practice Guidance (PPG).

The Environment Agency will always support and substantiate its objections to major development proposals at appeal wherever a refusal is lodged in line with its advice. If you are minded to grant permission against the Environment Agency's advice, please contact the Sustainable Places Officer named below before making a formal decision to discuss the conditions and informatives that the Environment Agency would wish to apply to this proposal.

In accordance with the Planning Practice Guidance (Reference ID: 7-043-20140306), 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.

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

Advice to Applicant

If the Applicant would like any further detailed advice we would be happy to provide this subject to a charge.

As part of this service you would have a dedicated project manager to coordinate the advice from different teams within the Environment Agency. It would also include bespoke technical and planning advice if you request this. This will allow you to have greater clarity about the assessments you need to accompany your planning application and certainty about whether the development is acceptable to us before you resubmit.

Yours faithfully

Mrs Sophie Brown
Sustainable Places Planning Advisor

Direct dial 02030 257250

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