

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

Our ref: HA/2020/122055/02-L01
Your ref: APP/20/00122
Date: 17 March 2020

Dear Sir or Madam,

DEMOLITION OF EXISTING DWELLING AND CONSTRUCTION OF A REPLACEMENT 1 NO. 3 BED DETACHED DWELLING TO INCORPORATE AN EXISTING OUTBUILDING WITH MODIFICATIONS, WITH BALCONY TO THE FRONT ELEVATION (REVISION TO APP/19/00421).

POINT VIEW, 10 WESTERN PARADE, EMSWORTH, PO10 7HS.

Thank you for consulting the Environment Agency on the above application following the submission of a Flood Risk Note.

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

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.

Reasons

The submitted Flood Risk Note does not comply with the requirements for site-specific flood risk assessments, as set out in the Planning Practice Guidance to the National Planning Policy Framework for Flood Risk and Coastal Change. The Flood Risk Note does not therefore adequately assess the development's flood risks. In particular, the submitted Flood Risk Note fails to:

- Take the impacts of climate change into account;
- Consider how a range of flooding events (including extreme events) will affect people and property; and
- Consider the requirement for flood emergency planning including flood warning and

evacuation of people for a range of flooding events up to and including the extreme event.

Overcoming our objection

To overcome our objection, the Applicant should submit a revised FRA which addresses the points highlighted above. If this cannot be achieved, we are likely to maintain our objection.

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

Advice to the Local Planning Authority and Applicant

Flood proofing

We strongly recommend the use of flood proofing and resilience measures. Physical barriers, raised electrical fittings and special construction materials are just some of the ways you can help reduce flood damage.

To find out which measures will be effective for this development, please contact your Local Planning Authority's Building Control department. In the meantime, if you would like to find out more about reducing flood damage, please visit the Planning Practice Guidance for Flood Risk and Coastal Change (<https://www.gov.uk/guidance/flood-risk-and-coastal-change>).

The following document may also be useful:

Department for Communities and Local Government: Improving the flood performance of new buildings:

<https://www.gov.uk/government/publications/flood-resilient-construction-of-new-buildings>.

Advice to the Local Planning Authority

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.

Flood warning and emergency response

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 Planning Practice Guidance 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 Planning Practice Guidance.

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/20/00122.

Yours faithfully,

Miss Anna Rabone
Sustainable Places Advisor

Direct dial: 02077 140525

Direct e-mail: anna.rabone@environment-agency.gov.uk