Our ref:	HA/2020/122286/01-L01
Your ref:	APP/19/00629
Date:	02 June 2020

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

Dear Sir/Madam

VARIATION OF CONDITION 3 OF PLANNING PERMISSION 97/62730/000/B TO EXTEND OCCUPANCY OF HOLIDAY PARK FROM 10 MONTHS TO 11 MONTHS 14 DAYS ALLOWING THE PARK TO BE USED BETWEEN 1ST MARCH AND 14TH FEBRUARY INCLUSIVE. WOODCOTT CARAVAN PARKS, FISHERY LANE, HAYLING ISLAND

Thank you for consulting the Environment Agency on the above application.

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

Environment Agency Position

We **object** to this application for removal or variation of condition 3 of planning permission 97/62730/000 for the following reasons:

Reasons

1. **Inadequate Flood Risk Assessment**

The absence of an adequate 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 warning and evacuation plan, the flood risk across the site has not been adequately identified for the lifetime of the proposed development. More detailed information relating to anticipated flood depths across the site and finished floor levels should be provided. Please note that, as per the 'Information Warning' attached to the data we have previously provide for this site, 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 those currently contained within the Flood Risk Assessment. The absence of an appropriate assessment of the anticipated flood risk to the site not only renders the FRA inadequate, it also means that the information needed to develop a warning and evacuation plan is not available.

2. Flood Risk Vulnerability Classification

Technical Guidance to the National Planning Policy Framework (NPPF) classifies development types according to their vulnerability to flood risk and gives guidance on which developments are appropriate in each Flood Zone. Table 2 of the NPPF for Flood risk vulnerability classification for caravans states:

a. Sites used for holiday or **short-let** caravans and camping, subject to a specific warning and evacuation plan are classified as **'more vulnerable'**

b. Caravans, mobile homes and park homes intended for **permanent** (year round) residential use is classified as **'highly vulnerable'**. Highly vulnerable developments are not appropriate in Flood Zone 3

The flood risk vulnerability classification of the site will therefore be determined by whether or not the requirement for occupants to vacate for only 2 weeks per year effectively permits them to reside on the site as their main or sole residence. The Local Planning Authority should provide a view to determine this. We note the comments provided by Environmental Health in relation to this issue.

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

We recommend that the application for the variation of variation of condition 3 of planning permission 97/62730/000 should therefore be refused on this basis until further information is provided to overcome the issues set out above

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 Zone 3.

If the Local Planning Authority considers the proposed development to constitute a short let caravan park as opposed to a permanently occupied residential site, you can overcome our objection by submitting an adequate site-specific flood risk assessment (FRA) which demonstrates that the development will not increase risk to people or property, or increase risk elsewhere and where possible, reduces flood risk overall. This must include an adequate warning and evacuation plan, developed in conjunction with the Local Planning Authority and its emergency planners. If this cannot be achieved we are likely to maintain our objection to the application.

Production of an improved FRA will not in itself result in the removal of an objection. We ask to be re-consulted with the results of an improved FRA. We will provide you with

Cont/d..

bespoke comments within 21 days of receiving formal re-consultation. Our objection will be maintained until an adequate FRA has been submitted.

Advice to Local Planning Authority / Applicant

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 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).

Please do not hesitate to contact me using the contact details shown below should you have any queries regarding the above information.

Yours faithfully

Mrs Sophie Brown
Sustainable Places Planning Advisor

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

End