

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

Our ref: HA/2020/122133/01-L01
Your ref: APP/20/00173
Date: 02 April 2020

Dear Sir or Madam,

VARIATION OF CONDITION 2 OF PLANNING PERMISSION 26320/1 TO EXTEND OCCUPANCY OF 4NO. CARAVANS FROM 8 MONTHS TO 10 MONTHS BETWEEN DATES OF 1ST MARCH TO 31ST DECEMBER INCLUSIVE.

11 HAVEN ROAD, HAYLING ISLAND, PO11 9QX.

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

In the absence of an acceptable Flood Risk assessment (FRA) we **object** to a variation of the condition 2.

Part of the site falls into a flood risk vulnerability category (highly vulnerable) that is inappropriate in Flood Zone 2 in which the site is partially located. The whole site is likely to be within a high probability of flooding by the year 2115.

We therefore recommend that the application should be refused planning permission.

Reasons

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 Planning Practice Guidance to the National Planning Policy Framework (NPPF) for Flood Risk and Coastal Change section. 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 for the lifetime of the site into account. There is no assessment of the impact of climate change using appropriate climate change

allowances. The caravan finished floor levels need to be assessed with the 1 in 200 year return period, plus climate change tidal flood levels.

- Flood risk mitigation measures to address flood risk for the lifetime of the site are inadequate because they will not make the development resilient to the flood levels. Consequently the development proposes no mitigation measures, including:
 - Safe access and egress routes;
 - Consider how people will be kept safe from the identified flood hazards; and
 - Consider the requirement for flood emergency planning including evacuation of people for a range of flooding events up to and including extreme events.

Overcoming our objection

To overcome our objection, the Applicant should submit an FRA which demonstrates that the development is safe without increasing risk. If this cannot be achieved, we are likely to maintain our objection.

Detailed information relating to anticipated flood depths, including climate change across the site and the caravans finished floor levels should be provided in any revised FRA. 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 should also request free data from us (a 'Product 4') to inform the FRA. This provides current tidal flood levels. A request can be sent to our Customers & Engagement team by emailing SSDEnquiries@environment-agency.gov.uk. A plan identifying the site should be provided along with the request. Requests are usually dealt with within 20 working days.

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 suitable warning and evacuation plan is not possible.

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

Advice to the Local Planning Authority and 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 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 could be made safe in accordance with the guiding principles of the Planning Practice Guidance.

Advice to the Local Planning Authority

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.

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

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.

Yours faithfully,

Miss Anna Rabone
Sustainable Places Advisor

Direct dial: 02077 140525

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