
Site Address:	40 Haven Road, Hayling Island, PO11 9RY		
Proposal:	Use of land for Four Static Caravans with 10 month occupancy each.		
Application No:	APP/19/00800	Expiry Date:	06/11/2019
Applicant:	Mr & Mrs Jones		
Agent:	Mr G Gard	Case Officer:	Tina Pickup
	ACE Designs		
Ward:	Hayling East		

Recommendation: **GRANT PERMISSION**

1 Site Description

The application site relates to a parcel of land located on the south side of Haven Road, which at this point is an unadapted private road. The area is largely characterised by mobile home sites of varying sizes, interspersed with the occasional residential dwelling. Currently the site accommodates a single mobile home, located at the southern end of the site. This static caravan is subject to an 8 month occupancy condition - see section 2 below.

The site has had new 2m high close boarded fencing with gates erected along its front boundary. There are some significant conifer trees on the eastern boundary with the adjacent plot at 42. Directly opposite the site is a large holiday site, Elliot's, whilst the site at No 38 adjacent has 4 caravans - this adjacent site has been recently upgraded with new tarmaced service areas between caravans and close boarded fencing on the shared boundary.

The site lies partly within flood zone 2.

2 Planning History

18082/3 - Permanent siting of one caravan - Permitted 11 November 1980 with condition that no caravan shall be used except for human habitation and between 1st March and 31st October in any year. Reason - to safeguard the local stock of holiday accommodation.

also of relevance the site adjacent, at number 38 Haven Road:

APP/12/00501 - Variation of Condition No. 2 of Planning Permission 00/53474/004 to allow occupation of one caravan (Plot 4) between the months of January and March. (Revised application.) This application was reported to the Development Management Committee on 30/5/2013 with a recommendation for refusal, but Members resolved to grant permission subject to the amendment of a legal agreement. However that legal agreement was never completed, and eventually, in 2016, the application was treated as Withdrawn. Therefore no permission was ever issued for the permanent occupation.

3 Proposal

As originally submitted this application proposed the existing static caravan having all year owner occupancy, with 3 additional static caravans with 10 month occupancy for short term holiday use. For flood risk reasons (see section 7 below) during the course of

determining this application the proposal has been amended to increase the occupancy of the existing caravan from 8 month to 10 months, with 3 additional static caravans with 10 month occupancy, giving a total of 4 caravans on site, all as 10 month occupancy.

Use of land for Four Static Caravans with 10 month occupancy each

4 Policy Considerations

National Planning Policy Framework
Havant Borough Council Borough Design Guide SPD December 2011
Havant Borough Council Parking SPD July 2016

Havant Borough Local Plan (Core Strategy) March 2011

CS11	(Protecting and Enhancing the Special Environment and Heritage of Havant Borough)
CS15	(Flood and Coastal Erosion)
CS16	(High Quality Design)
CS17	(Concentration and Distribution of Development within the Urban Areas)
CS21	(Developer Requirements)
CS5	(Tourism)
DM13	(Car and Cycle Parking on Residential Development)
DM3	(Protection of Existing Employment and Tourism Sites)
DM4	(Static Holiday Caravan Development)

Havant Borough Local Plan (Allocations) July 2014

AL1	(Presumption in Favour of Sustainable Development)
DM24	(Recreational Disturbance to Special Protected Areas (SPAs) from Residential Development)

Listed Building Grade: Not applicable.

Conservation Area: Not applicable.

5 Statutory and Non Statutory Consultations

Arboriculturalist

No objection. No trees of TPO quality on site.

Engineering/Drainage

None received

Environment Agency

On original submission:

We have reviewed the information as submitted and have the following comments.

Environment Agency Position

We **object** to the proposed development as the static caravan with all year owner occupancy part of the development falls within a flood risk vulnerability category that is inappropriate to the Flood Zone in which the application site is located. The application is therefore contrary to the National Planning Policy Framework and its associated planning practice guidance. We recommend that planning permission is refused on this basis.

Reason

The PPG classifies development types according to their vulnerability to flood risk

and provides guidance on which developments are appropriate within each Flood Zone. This site lies within Flood Zone 3, which is land defined as having a high probability of flooding.

The development is classed as Highly Vulnerable in accordance with table 2 of the Flood Zones and flood risk tables of the PPG. Tables 1 and 3 make it clear that this type of development is not compatible with this Flood Zone and therefore should not be permitted.

Furthermore, we object to the remaining part of the proposed development due to an insufficient Flood Risk Assessment.

In the absence of an acceptable Flood Risk Assessment (FRA) we object to this application and recommend that planning permission is refused.

Reason 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:

- consider how people will be kept safe from the identified flood hazards
 - consider how a range of flooding events (including extreme events) will affect people and property
 - 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
 - take the impacts of climate change into account
 - o There is no assessment of the impact of climate change using appropriate climate change allowances 'Flood risk assessments: climate change allowances'
 - o 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:
- Raised finished floor levels
 - Resistance and resilience measures
 - Safe access and egress routes

Overcoming our Objection The current proposed development is situated within Flood Zone 2 and therefore at risk from a 0.1% probability flood event, which would result in a flood level of 3.6m AOD. The submitted plans propose internal floor levels of 3.5m AOD. We would expect finished floor levels to be 600mm above the design flood level. As appropriate climate change allowances have not been taken into consideration we would remind you that this would need to be ascertained before floor levels are established. The Local Planning Authority should consider an appropriate lifetime for a static caravan when deciding how many years into the future climate change needs to be considered.

The submitted FRA does not include appropriate climate change allowances, which would be needed to make an assessment on the proposed development remaining safe for its lifetime. The flood level appropriate CC allowance would then be used to assess the appropriate mitigation measures incorporated within the FRA. We have included some advice below regarding sources of information.

To overcome our insufficient FRA 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 re-consult us on any revised FRA submitted and we'll respond within 21 days of receiving it

Updated response confirming site within flood zone 2, not 3:

Environment Agency Position

The site is wholly in Flood Zone 2 on the EAs Flood Map for Planning (Rivers and Sea), designated as having a land assessed as having between a 1 in 100 and 1 in 1,000 annual probability of river flooding (1% – 0.1%), or between a 1 in 200 and 1 in 1,000 annual probability of sea flooding (0.5% – 0.1%) in any year. Whilst the applicant has described the proposed development as More Vulnerable, due to the proposed year round occupation of one of the caravans on site we would consider this development to be Highly Vulnerable. As such Havant Borough Council should confirm, as the decision maker, what vulnerability classification the proposed works constitute as and if all of the proposal should undertake the exception test. Notwithstanding the above, the following objection from our previous response still stands.

In the absence of an acceptable Flood Risk Assessment (FRA) we **object** to this application and recommend that planning permission is refused.

Reason(s) 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:

- • consider how people will be kept safe from the identified flood hazards
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- ▪ Safe access and egress routes

Overcoming our Objection The current proposed development is situated within Flood Zone 2 and therefore at risk from a 0.1% probability flood event, which would result in a flood level of 3.6m AOD. The submitted plans propose internal floor levels of 3.5m AOD. We would expect finished floor levels to be 600mm above the design flood level. As appropriate climate change allowances have not been taken into consideration we would remind you that this would need to be ascertained before floor levels are established. The Local Planning Authority should consider an appropriate lifetime for a static caravan when deciding how many years into the future climate change needs to be considered.

The submitted FRA does not include appropriate climate change allowances, which would be needed to make an assessment on the proposed development remaining safe for its lifetime. The flood level appropriate CC allowance would then be used to assess the appropriate mitigation measures incorporated within the FRA. We have included some advice below regarding sources of information.

Exception Test These proposed works include the development of a permanent occupancy static caravan, a Highly Vulnerable flood risk classification. According to Paragraph 160 of the NPPF the development should demonstrate that it provides wider sustainability benefits to the community and; will be safe for its lifetime without increasing flood risk elsewhere.

As noted in the NPPF and NPPG, it is for you, the local planning authority, to assess and determine if both elements of the exception test have been passed. Only upon successfully passing the flood risk exception test should other considerations including our comments noted below be applied.

Environment Agency - on changed description and revised FRA: (FINAL COMMENTS)

Thank you for the consulting the Environment Agency on the above application following the submission of a revised Flood Risk Assessment (FRA), and an amendment to the description for the application, with all four caravans now proposed for 10 month occupancy.

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

Environment Agency position

We are satisfied that our previous objection to the application can be removed (dated 14 October 2019, our ref: HA/2019/121629), provided that the following condition be attached to any planning permission granted, and that the details in relation to the condition be submitted and approved by the Local Planning Authority.

Condition

The development shall be carried out in accordance with the submitted Flood Risk Assessment (FRA) (ref: QFRA1577 version 1.0, dated 21/01/2020) and the following mitigation measures it details:

- 1. Finished floor levels shall be set no lower than 3.86 metres above Ordnance Datum (AOD) (section 6.1 of the submitted FRA); and**
- 2. Occupancy of all caravans on site will be limited to 10 month occupancy (section 3.2 of the submitted FRA).**

These mitigation measures shall be fully implemented prior to occupation and subsequently in accordance with the scheme's timing/phasing arrangements.

The measures detailed above shall be retained and maintained thereafter throughout the lifetime of the development.

Reasons

To reduce the risk of flooding to the proposed development and future occupants. The condition is in line with the Planning Practice Guidance (PPG) to the National Planning Policy Framework (NPPF) for Flood Risk and Coastal Change.

Advice to the Local Planning Authority

The Applicant has raised the finished floor levels to 3.86mAOD, giving 300mm of freeboard above the design flood height of 3.56mAOD for the 1 in 200 year flood with climate change adjustments. This satisfies our previous concerns relating to the finished floor levels being below that of the design flood height.

The Applicant has also revised their occupancy timings, so that all caravans on site are now proposed to have 10 month occupancy. We considered the previous application for this site (whereby one of the four caravans was proposed for

occupancy throughout the entire year) as '*Highly Vulnerable*' (in accordance with Table 2 of the PPG), due to the intention to use the caravan for permanent residential use. As the revised proposal has detailed a 10 month occupancy for all four caravans, we consider this to be a '*More Vulnerable*' classification (in accordance with Table 2 of the PPG). However, it is for the Local Planning Authority to determine the classification of the vulnerability of the development. As previously stated; if there was to be occupancy of the caravan(s) all year round, this would result in an increase in flood risk.

The Local Planning Authority, as the decision maker, should be satisfied that the condition limiting occupancy to 10 months of the year can be maintained in order to ensure the flood risk is mitigated. We recommend that the Local Planning Authority should be satisfied that occupation of all four caravans under all circumstances should not exceed 10 months. For this reason, should the Local Planning Authority be minded to grant planning permission, we strongly recommend that the above condition relating to occupancy timings is applied.

Advice to the Applicant

Signing up for flood warnings

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>. Our flood warning service is 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, please visit <https://www.gov.uk/prepare-for-flooding>.

Environmental Health Manager

On original submission:

I have read the enclosed documentation provided by the applicant and can comment as follows:

The proposed site plan submitted with this application, appears to only allow approximately 1-metre separation from the site boundary to the caravans.

The conditions attached to the current site licence require a 1.5-metre separation.

If the planning application is successful, the conditions to the site licence will almost certainly be altered to reflect the relevant model standards because of the material change. A 3-metre separation between any caravan and the site boundary will likely be required. There is a right of appeal against any alterations to site licence conditions made by the local authority.

The applicants will not likely be able to implement the proposed plans and be compliant with the existing conditions and certainly would not be compliant with altered conditions as suggested above if the proposed plans were implemented. The above comments refer to matters concerning the licensing of caravan sites only and none of the comments provided shall prejudice any comments that any other officer of the Environmental Health department may still make regarding this application

Environmental Health Manager

On amended layout plan:

I have reviewed the revised plans provided by the applicant and can advise we now

have no adverse comments subject to the caravans being metal 'skinned'. Where caravans have a wooden skin there would need to be 6 metre separation. The applicant should be made aware of the need to hold a caravan site licence and that conditions will be attached.

The above comments refer to matters concerning the licensing of caravan sites only and none of the comments provided shall prejudice any comments that any other officer of the Environmental Health department may still make regarding this application.

Natural England Government Team

Thank you for consulting Natural England on the above HRA and AA.

No objection subject to mitigation

Recreational disturbance

Since this application will result in a net increase in residential accommodation, impacts to the coastal Special Protection Area(s) and Ramsar site(s) may result from increased recreational pressure. Havant Borough Council has measures in place to manage these potential impacts through the agreed strategic solution which we consider to be ecologically sound.

Thank you for confirmation that the HRA /AA financial contribution has been recalculated based on a flat rate for each caravan (details attached). Natural England agrees with this approach. Subject to this financial contribution being secured, Natural England is satisfied that the proposal will mitigate against the potential recreational impacts of the development on the site(s). The development proposal will need to be in accordance with the Definitive Strategy rates. Please note these rates were updated as of 1 April 2019 and will be updated as of 1 April 2020.

It is Natural England's view that the Solent Mitigation Recreation Strategy Contribution adequately mitigates the effects of the development on potential recreational impacts on the designated sites.

Nutrient Neutrality

Natural England notes that your authority, as competent authority, has undertaken an appropriate assessment of the proposal in accordance with Regulation 63 of the Conservation of Species and Habitats Regulations 2017 (as amended). Natural England is a statutory consultee on the appropriate assessment stage of the Habitats Regulations Assessment process.

Natural England is aware that your authority has adopted an interim strategy using Grampian conditions to address nutrient impacts from developments currently in the planning system and we have been working with the Council to develop this approach. It is noted that the mitigation would be secured through a Grampian condition, requiring the mitigation package to be agreed, provided to the Council and implemented prior to the occupation of the development.

Your appropriate assessment concludes that your authority is able to ascertain that the proposal will not result in adverse effects on the integrity of any of the sites in question. With regard to deterioration of the water environment, it is noted that the approach to address the positive nitrogen budget for this development is to offset against the interim strategy, with measures to ensure this approach can be adequately secured and accounted for.

It is Natural England's view that in this case, provided the Council as competent authority, is satisfied that the approach will ensure the proposal is nutrient neutral and the necessary measures can be fully secured; Natural England raises no further concerns.

Please consult Natural England on the discharge of the Grampian condition.

6 **Community Involvement**

This application was publicised in accordance with the Council's Code of Practice for Publicity of Planning Applications approved at minute 207/6/92 (as amended), as a result of which the following publicity was undertaken:

Number of neighbour notification letters sent: 6

Number of site notices: 1

Statutory advertisement: Not applicable.

Number of representations received: 1

Comment	Officer Comment
We live just around the corner to this proposed development and next to a much larger caravan park, although not directly affected by the proposal am very worried that should this 12 month residency be approved would open the floodgate for many more proposals. We live in an area of many caravan sites many that are not in use so feel that there may not be a need for more caravans and in this particular location consider one permanent home may be a better option. My objection is for the 12 month occupancy	Precedent noted but each application considered on its merits Demand for proposal not a planning matter Noted

7 **Planning Considerations**

7.1 Having regard to the relevant policies of the development plan it is considered that the main issues arising from this application are:

- (i) Principle of development
- (ii) Flood risk
- (iii) Impact upon residential amenity & character and appearance of the area
- (iv) Compliance with Habitats Regulations
- (v) Other matters

- (i) Principle of development

The application site is situated within an urban area where further development is considered acceptable subject to the usual development control criteria. The area is

characterised by holiday caravan accommodation which supports the tourism role for the island. Policies CS5, DM3 and DM4 of the Core Strategy all support tourism and seek to protect existing tourist sites. Policy DM4 specifically relates to Static Holiday Caravan Development and supports the improvement of such sites where the development would have a close physical relationship to existing caravan sites; and the caravan is to be used for holiday purposes only and has a limited period of occupancy for a maximum of ten months per calendar year.

The application site relates to an existing tourist site with a lawful use for 1 static caravan with an 8 month occupancy restriction. The proposal would make better use of this site by retaining the tourist use but intensifying the use to a total of 4 caravans. The existing caravan on site would be occupied by the owner for 10 months (this is not currently conditioned for short term holiday use only) and the additional 3 caravans are proposed for short term holiday use. It is proposed that all 4 would be limited by condition to 10 month occupancy and as such the proposal is considered to comply with policies CS5, DM3 and DM4.

(ii) Flood risk

The site lies partly within Flood Zone 2 - the meandering boundary is such that the central part of the site is within the current flood zone 2. As originally submitted the proposal involved one permanently occupied unit, which according to the NPPG falls within the "highly vulnerable" classification; and 3.No ten month occupancy caravans, which fall within the "more vulnerable" classification. On this basis the proposed permanent occupancy caravan would have been at high risk and would have needed to pass the Exception Test. The originally submitted FRA did not meet the requirements of the NPPG, did not take into account climate change, and did not include an exception test; nor did it provide adequate mitigation measures including sufficiently raised finished floor levels. As such the Environment Agency objected to the original submission.

To overcome the fundamental objection from the Environment Agency to the permanently occupied caravan, the proposal was amended to increase the occupancy of the existing caravan by just 2 months to 10 months, and site 3 additional holiday caravans, such that all 4 caravans would be for 10 month occupation. This would reduce them all to the "more vulnerable" classification, where they are acceptable in principle in flood zone 2. A revised FRA was also submitted that takes into account climate change etc as requested by the EA.

It is also noted that the NPPG advises that a sequential test should be undertaken for changes of use to caravan/mobile home site beyond flood zone 1. In this instance the site is an existing caravan site and the proposal is not a change of use but a proposed intensification of use. Accordingly, sequentially, it is considered that making better use of an existing site is preferable to proposing caravans on a new site. Since both the site and immediate area are characterised by holiday caravans, and the Council has not allocated a better site for holiday caravans, then it is considered that the proposal for an intensification of an existing use would pass the sequential test.

The revised FRA takes account of climate change tidal level and proposes to site the caravans no lower than 3.86mAOD which is 0.38m above the existing site level. It also sets out flood resilient measures such as non-return valves, raised service meters etc, and recommends that the Environment Agency's Flood Warning Service is used, aswell as on site SuDs measures. The report concludes that the proposal will be safe, in terms of flood risk, for its design life and will not increase the flood risk elsewhere.

The Environment Agency were re-consulted on this revised FRA and have removed their objection, recommending that the finished floor level is conditioned, and the LPA are satisfied that the 10 month occupancy can be adequately controlled to ensure the development remains in the "more vulnerable" classification only. This can be conditioned.

(iii) Impact upon residential amenity & character and appearance of the area

The nearest C3 dwelling to the east is separated by another caravan site. Given the site context and existing level of holiday caravans in the immediate area, the intensification of the use of the site by 3 extra caravans would be unlikely to have any material adverse impact on residential amenity. The proposal is also considered compatible and appropriate to the character of the area. Therefore the proposal is considered compliant with policy CS16.

(iv) Compliance with Habitats Regulations

The Council has conducted a Habitats Regulations Assessment (HRA), including Appropriate Assessment (AA), of the proposed development under Regulation 63 of The Conservation of Habitats and Species Regulations 2017 (as amended). The Council's assessment as competent Authority under those regulations is included in the case file. The screening under Regulation 63(1)(a) found that there was likely to be a significant effect on several Solent European Sites (as defined in the applications HRA) due to both the increase in recreational pressure and the decrease in water quality that would result from the additional 3 caravans proposed (note this does not apply to the existing caravan on site).

The planning application was then subject to Appropriate Assessment under Regulation 63. This included two packages of avoidance and mitigation packages. The first is a package of measures based on the suggested scale of mitigation in the Solent Recreation Mitigation Strategy. In this instance, because the number of bedrooms in each of the three caravans is unknown and could be changed in the future, then the flat rate was used. Accordingly an SRMS contribution of £1539.88 has been received with associated signed Deed. The second is a package of measures based on the Position Statement on Nutrient Neutral Development. The applicant has indicated a willingness to enter into a legal agreement/Grampian condition to secure the mitigation packages prior to occupation of the additional 3 caravans.

The Appropriate Assessment concluded that this is sufficient to remove the significant effect on the SPAs which would otherwise have been likely to occur. The HRA was subject to consultation with Natural England as the appropriate nature conservation body under Regulation 63(3) who have confirmed that they agree with the findings of the assessment. The applicant has indicated a willingness to enter into a legal agreement/Grampian condition to secure the mitigation packages.

(v) Other matters

Environmental Health requirements re proximity to site boundaries has been complied with following the receipt of the revised site plan. A site license will also be required and an Informative can be added to this effect. Each caravan would have 1 parking space which is considered reasonable for future users/tourists.

8 Conclusion

The amended scheme for 4No 10 month occupancy caravans, with the additional 3 being for short term holiday use, is considered an appropriate use of the site, supporting the tourism of Hayling Island. Provided both the 10 months occupation and the finished floor levels are conditioned, then there is no objection from the Environment Agency based on flood risk. With the Grampian style condition to mitigate against impacts on water quality prior to occupation, then the proposal is recommended for permission.

9 RECOMMENDATION:

That the Head of Planning be authorised to **GRANT PERMISSION** for application APP/19/00800

(A) subject to the following conditions

- 1 The development must be begun not later than three years beginning with the date of this permission.
Reason: To comply with the requirements of Section 91 of the Town and Country Planning Act 1990 as amended by Section 51 of the Planning and Compulsory Purchase Act 2004.
- 2 The development hereby permitted shall be carried out in accordance with the following approved plans:

Site and Block Plan - Drawing No. 190701/01 Rev A
Site Plan as Proposed - Drawing No. 190701/02 Rev A
Flood Risk Assessment by UK Flood Risk Project Ref: QFRA 1577 Version 1.0 dated 21/01/2020

Reason: - To ensure provision of a satisfactory development.
- 3 The additional 3 caravans hereby permitted shall not be occupied until:
 - a) A water efficiency calculation in accordance with the Government's National Calculation Methodology for assessing water efficiency in new dwellings has been undertaken which demonstrates that no more than 110 litres of water per person per day shall be consumed within the development, and this calculation has been submitted to, and approved in writing by, the Local Planning Authority; all measures necessary to meet the agreed waste efficiency calculation must be installed before first occupation and retained thereafter;
 - b) A mitigation package addressing the additional nutrient input arising from the additional 3 caravans has been submitted to, and approved in writing by, the Local Planning Authority. Such mitigation package shall address all of the additional nutrient load imposed on protected European Sites by the development when fully occupied and shall allow the Local Planning Authority to ascertain on the basis of the best available scientific evidence that such additional nutrient loading will not have an adverse effect on the integrity of the protected European Sites, having regard to the conservation objectives for those sites; and
 - c) All measures forming part of that mitigation package have been provided to the Local Planning Authority.

Reason: There is existing evidence of high levels of nitrogen and phosphorus in the water environment with evidence of eutrophication at some European designated nature conservation sites in the Solent catchment. The PUSH Integrated Water Management Strategy has identified that there is uncertainty as to whether new housing development can be accommodated without having a detrimental impact on the designated sites within the Solent. Further detail regarding this can be found in the appropriate assessment that was carried out regarding this planning application. To ensure that the proposal may proceed as sustainable development, there is a duty upon the local planning authority to ensure that sufficient mitigation for is provided against any impacts which might arise upon the designated sites. In coming to this decision, the Council have had regard to Regulation 63 of the Conservation of Habitats and Species Regulations 2017, Policy CS11 of the Havant Borough Local Plan (Core Strategy) 2011 and Policy E14 of the Pre-Submission Havant Borough Local Plan 2036.

- 4 The development hereby permitted shall be carried out in accordance with the submitted Flood Risk Assessment ref: QFRA 1577 Version: 1.0 dated 21/01/2020 and the following mitigation measures:

- Finished floor levels shall be set no lower than 3.86 metres above Ordnance Datum (AOD) and remain so in perpetuity;
- No caravan on the site shall be occupied at any time during the months of January and February.

Reason: To prevent the permanent occupation of the caravans and ensure that floor levels are appropriate in order to reduce the flood risk to future occupants having due regard to Planning Practice Guidance to the National Planning Policy Framework and policy CS15 of the Havant Borough Local Plan (Core Strategy) 2011.