

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

Our ref: HA/2019/121470/01-L01
Your ref: APP/19/00623
Date: 30 July 2019

Dear Sir/Madam

RETAIN THE EXISTING 'FOWLEY COTTAGE' DWELLING AND CONSTRUCTION OF 6NO. 5 BED DETACHED DWELLINGS, TWO ON THE WARBLINGTON ROAD FRONTAGE AND FOUR TO THE REAR GARDEN AREA. ACCESS TO PLOT 5 TO BE TAKEN OFF WARBLINGTON ROAD, ACCESS TO PLOTS 1-4 AND 6 TO BE TAKEN OFF CURLEW CLOSE FOWLEY COTTAGE, 46 WARBLINGTON ROAD, EMSWORTH, PO10 7HH

Thank you for the consultation on the above application, please quote our reference on all correspondence.

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

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.

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:

- take the impacts of climate change into account adequately. 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 2115 of 4.5mAOD as stated in paragraph 1.14 of FLOOD_RISK_ASSESSMENT-1180237 (FRA) submitted with the application. Consequently the development proposes inadequate:

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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- Raised finished floor levels. Paragraph 1.16 of the FRA states “*In this regard, floor levels of the southernmost properties could be designed to be above the 2115 estimated flood level of 4.5m AOD*”, but it does not specify what they will actually be. The drawing in Appendix 6 titled “*Foul and Surface Water Drainage Strategy*” shows the 2 southern most properties as having finished floor levels (FFL) of 4.2mAOD and 4.1mAOD which are both below the expected 2115 flood level of 4.5mAOD.
- 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
 - Safe access and egress routes
- consider how a range of flooding events (including extreme events) will affect people and property
 - Resistance and resilience measures

Overcoming our objection

To overcome our objection, the applicant should submit a revised FRA which addresses the points highlighted above.

Advice to Applicant

Finished floor levels (FFL)

The FRA needs to ensure that built development proposals incorporate adequate flood risk mitigation up to the design flood level for 2115 of 4.5mAOD (as stated in the FRA). The following government website will assist the applicant in determining the adequate freeboard for the development (this includes coastal, estuarine and tidal) :

<https://www.gov.uk/government/publications/accounting-for-residual-uncertainty-an-update-to-the-fluvial-freeboard-guide>

Safe access and egress

The application needs to demonstrate that occupants can remain safe for the lifetime of the development when allowances for climate change are taken into consideration. There needs to be sufficient flood risk mitigation up to the design flood level and/or specified arrangements for safe access and egress.

Flood resistance and resilience

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

Revised FRA

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.

Environmental permit

Planning permission does not remove the requirement for an Environmental Permit. The Environmental Permitting (England and Wales) Regulations 2016 require a permit to be obtained for any activities which will take place:

- on or within 8 metres of a main river (16 metres if tidal)
- on or within 8 metres of a flood defence structure or culvert (16 metres if tidal)
- on or within 16 metres of a sea defence
- involving quarrying or excavation within 16 metres of any main river, flood defence (including a remote defence) or culvert

- in a floodplain more than 8 metres from the river bank, culvert or flood defence structure (16 metres if it's a tidal main river) and you don't already have planning permission.

For further guidance please visit <https://www.gov.uk/guidance/flood-risk-activities-environmental-permits> or contact our National Customer Contact Centre on 03702 422 549. The applicant should not assume that a permit will automatically be forthcoming once planning permission has been granted, and we advise them to consult with us at the earliest opportunity.

Please do not hesitate to contact me on the number below should you have any queries on the above information.

Yours faithfully

Mrs Sophie Brown
Sustainable Places Planning Advisor

Direct dial 02030 257250

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