

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

**Our ref:** HA/2019/121629/01-L01  
**Your ref:** APP/19/00800  
**Date:** 01 October 2019

Dear Sir/Madam

**CHANGE OF USE FROM DOMESTIC CURTILAGE WITH STATIC CARAVAN TO  
STATIC CARAVAN WITH ALL YEAR OWNER OCCUPANCY AND THREE  
ADDITIONAL STATIC CARAVANS WITH 10 MONTH RENTAL OCCUPANCY.  
40 HAVEN ROAD, HAYLING ISLAND, PO11 9RY**

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**

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

Environment Agency  
Guildbourne House Chatsworth Road, Worthing, West Sussex, BN11 1LD.  
Customer services line: 03708 506 506  
[www.gov.uk/environment-agency](http://www.gov.uk/environment-agency)

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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
  - There is no assessment of the impact of climate change using appropriate climate change allowances ['Flood risk assessments: climate change allowances'](#)
  - 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.

### **Advice to applicant**

We do not prepare or provide FRAs. However, our Customers and Engagement teams can provide any relevant flood risk information that we have available. Please contact [SSDEnquiries@environment-agency.gov.uk](mailto:SSDEnquiries@environment-agency.gov.uk).

Your local planning authority should have undertaken a Strategic Flood Risk Assessment (SFRA) which will also include local flood risk information to inform your FRA. Please contact your local planning authority to determine what information is available. Further advice on what to include in an FRA can be found at <https://www.gov.uk/guidance/flood-risk-and-coastal-change#site-specific-flood-risk-assessment-all>

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](mailto:planningSSD@environment-agency.gov.uk)