

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

Our ref: HA/2017/119857/01-L01
Your ref: APP/17/00942
Date: 03 November 2017

Dear Sir/Madam

USE OF LAND FOR TOURING CARAVAN SITE AND ALTERATION OF ACCESS.

LAND ADJACENT TO MANDAI, ST PETERS ROAD, HAYLING ISLAND

Thank you for consulting the Environment Agency on the above planning application which we received on 17 October 2017.

Environment Agency Position

In the absence of an acceptable Flood Risk Assessment (FRA) we object to the grant of planning permission and recommend refusal on this basis for the following reasons:

The FRA submitted with this application does not comply with the requirements set out in paragraph Section 9 & 10 of the Planning Practice Guidance to the National Planning Policy Framework (NPPF) for Flood Risk and Coastal Change.

The submitted FRA does not therefore, provide a suitable basis for assessment to be made of the flood risks arising from the proposed development. In particular, the submitted FRA fails to:

- 1. Take the impacts of climate change into account**
- 2. Consider how people will be kept safe from flood hazards identified**
- 3. Consider the effect of a range of flooding events including extreme events on people and property.**
- 4. 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.**

Overcoming our objection

You can overcome our objection by submitting an FRA which covers the

Environment Agency
Canal Walk, ROMSEY, Hampshire, SO51 7LP.
Customer services line: 03708 506 506
www.gov.uk/environment-agency
Cont/d..

deficiencies highlighted above and demonstrates that the development will not increase risk elsewhere and where possible reduces flood risk overall. If this cannot be achieved we are likely to maintain our objection to the application. Production of an FRA will not in itself result in the removal of an objection. We ask to be re-consulted with the results of the FRA. We will provide you with 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

The application site is located largely within flood zone 1, however, the access road and a small part of the entrance to the site is located within tidal flood zone 3 and is considered to have a high probability (> 1 in 200, 0.5%) of flooding from the sea in any year.

The current day 1 in 200 year tide level is given as 3.3mAOD and this rises to 3.8mAOD in the year 2070, when the affects of climate change and sea level rise are considered. Road levels adjacent to the site are set at about 3.3mAOD.

The submitted planning statement has identified that the access road is at risk of flooding but does not assess the level of risk to the site over the developments full lifetime (60 years for commercial). Information should be provided on site levels and this compared to the 2070 flood level of 3.8mAOD. If it can be demonstrated that the site itself is safe from flooding then the potential lack of access should be addressed through a site specific flood management plan which would need to be agreed with the LPA. Depending upon the outcome of the further assessment the Environment Agency may be able to remove it's objection on flood risk grounds.

Advice to Local Planning Authority

The Environment Agency will always support and substantiate its objections to major development proposals at appeal wherever a refusal is lodged in line with its advice. If you are minded to grant permission against the Environment Agency's advice, please contact the Planning Liaison Officer named below before making a formal decision to discuss the conditions and informatives that the Environment Agency would wish to apply to this proposal.

In accordance with the Planning Practice Guidance (Reference ID: 7-043-20140306), 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.

If you are minded to approve the application contrary to our objection, we would be grateful if you could re-notify the Environment Agency 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.

Yours faithfully

Mr Jon Maskell
Planning Advisor, Environment Agency

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