

**56a BRACKLESHAM ROAD
HAYLING ISLAND
PO11 9SJ**

PLANNING APPLICATION

Addendum: FRA Sequential & Exception Test Assessment



Prepared by

APD
Arthurs Planning & Development

Contents

1. Introduction
2. Site and Proposed Development
3. Flood Risk Status of Site
4. Planning Policy Context
5. Scope of Sequential Assessment Findings
6. Exception Test
7. Conclusions

Appendices

1. Site Location Plan
2. Environment Agency Response – 1 December 2017
3. Local Agent Correspondence

1 INTRODUCTION

- 1.1 This Addendum Flood Risk Assessment (FRA) Sequential Test Assessment is prepared by APD for 'the applicant, and is submitted in support of proposals for a full planning application following an initial discussion and request by the Local Planning Authority (LPA) to expand on the detail of the sequential approach adopted when preparing the Flood FRA.
- 1.2 Planning permission is sought for a single two-bedroom residential dwelling on the site known as 56a Bracklesham Road, Hayling Island, refer to Appendix 1 for site location plan.
- 1.3 The purpose of this report is to demonstrate that the Sequential and Exception test has been correctly applied in line with the NPPF's Flood Risk Practice Guidance and that the proposed development should be considered acceptable and supportable in these terms.
- 1.4 In terms of supporting documentation, please refer in particular to the submitted Flood Risk Assessment prepared by Ambiental and relevant correspondence received from the Environment Agency on 1 December 2017 (Appendix 2).

2. SITE AND PROPOSED DEVELOPMENT

- 2.1 The application site is known as 56a Bracklesham Road, the site is 10.5 m wide by 48 m deep, the site area is 504 sqm. The site is an empty plot, sandwiched between a long unbroken run of houses on similar shaped plots.



- 2.2 The properties on either side of the application site have recently been redeveloped and extended, they are three storey properties with a modernist aesthetic that the proposed development will take reference from and respond to in a positive manner.
- 2.3 No. 56 Bracklesham Road was granted planning consent (App No.16/00122) in April 2016 for: 'Demolition of existing entrance and construction of 3 storey side extension to house new staircase. Installation of bi-fold doors to replace existing windows to first and second floor'. The application documentation and officers report referred to the adjoining undeveloped site.

- 2.4 To the east of the application site 56b Bracklesham Road, this property was granted consent in 2006 (App No. 05/52808/004), the three storey property is built in a modern style, with white render and a sloping roof form. Subsequent applications have permitted terracing, a balcony and pool to the property.



- 2.4 By granting consent for the subdivision of the original residential plot of 56 Bracklesham Road into three separate demises it is argued that the planning authority has in effect accepted the principle that No.56a has formed a vacant site for development. The established use of the site has been residential for some time and remains as such.
- 2.5 The detailed application is submitted for an exceptional detached, two-bedroom residential unit over three floors, with car parking for two cars on a gravel forecourt area. The design of the house has been carefully considered to mitigate any potential flood risk, act to reduce water runoff to provide improved conditions for the wider area, respects the responds in a positive manner to the design language in the adjoining area and retains the amenity enjoyed by the adjoining properties.

3. FLOOD RISK STATUS OF SITE

- 3.1 The proposal site is located within Flood Zone 3 (High Risk; >0.5% chance of annual tidal flooding) and is considered to be a 'More Vulnerable' development. A Phase 1 Flood Risk Assessment (FRA) has been prepared by Ambiental and is submitted as part of the application. The report follows the guidelines contained within the NPPF and concludes that the "proposed development type is considered to be suitable assuming appropriate mitigation (including adequate warning and evacuation procedures) can be maintained for its lifetime, given that:
- a) the site lies within a developed residential area with substantial 'hold the line' flood defence infrastructure;
 - b) site is located in area of tidal flooding;
 - c) the site lies within an area where the long-term policy for the coastline is 'Hold the

Line', therefore the site will continue to be afforded flood defence protection and in effect the flood risk to the site is much reduced and outside that of Zone 3;

- d) the ground floor is to be used as a garage and storage area, all habitable rooms to be located on the first floor, above all modelled flood levels; and,
- e) in terms of flood vulnerability, significant betterment can be achieved through the implementation of flood warning procedures;"



3.2 Under PPG revised in March 2015, new development should only be considered appropriate in areas at risk of flooding if priority has been given to the use of sustainable drainage systems. Drainage proposals will limit the additional runoff generated from the increase in developed area on the site to greenfield runoff rates if practicable. The only area with built form is the proposed house and the water run-off from the roof will be deposited in soakaways. However, if deemed impractical, any additional flows discharged to the ditch will need to be agreed with the LLFA.

3.3 The ground floor of the proposed development is to be used as a garage, storage and seasonal seating area. All habitable rooms will be located on the first and second floors approximately 3m above external ground levels, and therefore above all modelled flood levels. Internal access is provided throughout the dwelling to provide an area of safe refuge on the upper floors of the property. No additional pressures will be placed on the emergency services in a flood event, in common with other properties in this built-

up area the combination of existing flood defences'; suitable building design and early warning technology will ensure that all residents and the property will be capable of managing the impacts of flood damage.

- 3.4 The Flood Risk Assessment submitted with the planning application concludes that there will be no adverse flood risk impact because of the development, subject to the development complying with the proposed mitigation measures and design recommendations.
- 3.5 In response to the proposed application the Environment Agency letter of 01 December 2017 confirmed that no objection to the proposed development on flood on environmental grounds was raised provided subject to a condition:

Condition – Implementation of Flood Risk Assessment

“The development permitted by this planning permission shall only be carried out in accordance with the approved Flood Risk Assessment (FRA) and the following mitigation measures detailed within the FRA.

- All habitable living accommodation shall be located at first floor level or above. The first floor level should be set no lower than 3 metres above existing ground levels (paragraph 1.7 and 7.4 of FRA.)
- Internal access is to be provided throughout the dwelling to provide an area of safe refuge on the upper floors of the property (paragraph 1.7 of FRA.)
- The provision of flood resilient construction measures has been submitted with the FRA and a site specific flood warning and evacuation plan is in place and to be implemented (section 7 of FRA.)

Reasons

To ensure the safety of the development and future occupants in line with section 9 of the Planning Practice Guidance to the National Planning Policy Framework (NPPF) for Flood Risk and Coastal Change. “

- 3.6 The applicant has confirmed they are willing to accept the provisions outlined in the condition to mitigate against the possible impacts of future flooding. The applicant notes that no reference or questioning of the initial approach to the sequential and exception test was made by the Environment Agency and it would appear reasonable to assume that this was considered acceptable.

4. PLANNING POLICY

- 4.1 This section provides a summary of relevant policy as set out by the Government within existing policy guidance, as well as the Development Plan.

NATIONAL POLICY

- 4.2 Relevant central government policy is contained within the National Planning Policy Framework (NPPF), published in March 2012.

- 4.3 This document replaces the Government's previous planning guidance of flood risk set out in PPS25 – Development and Flood Risk. The NPPF also advises that all existing local planning policies should be read in conjunction with the Framework. Where there is a conflict between existing planning policies and the Framework the weight that should be applied to existing policies in the decision making process should be reduced (paragraph 215).
- 4.4 The NPPF confirms that the aim of the Sequential Test is to steer new development to areas with the lowest risk of flooding. Developments should not be permitted if there are reasonable alternative sites available for the proposed development in areas with a lower probability of flooding. A sequential approach should be used in areas known to be at risk of any form of flooding. No specific guidance on the methodology to be applied for the sequential test is contained in the NPPF.
- 4.5 If, following application of the Sequential Test, it is not possible or consistent with wider sustainability objectives for the development to be located in zones with a lower probability of flooding, the Exception Test can be applied if appropriate. For the Exception Test to be passed:
- It must be demonstrated that the development provides wider sustainability benefits to the community that outweigh flood risk, informed by a Strategic Flood Risk Assessment where one has been prepared; and
 - A site-specific flood risk assessment must demonstrate that the development will be safe for its lifetime taking account of the vulnerability of its users, without increasing flood risk elsewhere, and, where possible, will reduce flood risk overall.
- 4.6 Both elements of the test will have to be passed for development to be allocated or permitted.

TECHNICAL GUIDANCE

- 4.7 The Technical Guidance to the Framework provides further guidance on the use of the Sequential and Exception Tests. It is the confirmed aim of the Sequential Test to steer the development to areas with the lowest probability of flooding. The EA Strategic Flood Risk Assessment and the EA Flood Maps for Planning should be the starting point for the sequential test.
- 4.8 Flood Zones 2 and 3 are shown on the EA Flood Maps, with Zone 1 being all land falling outside of Zones 2 and 3. Developments should be directed towards the zones with the lowest floor risk where possible. Where there are no reasonable available sites in Flood Zone 1, local planning authorities when allocating land in Local Plans or determining planning applications for development at any particular location, should take into account the flood risk vulnerability of land uses as set out in Table 2 of the Framework's Technical Guidance and consider reasonably available sites in Flood Zone 2 applying the exceptions test if required. Only where there are no reasonably available sites in Flood Zone 1 or 2 should the sustainability of sites in Flood Zone 3 be considered, taking into account the flood risk vulnerability of land uses and applying the exceptions test if required.
- 4.9 Table 1 – Flood Zones, of the technical guidance confirms the types of development that are appropriate within each Flood Zone. There are no restrictions on the types of land uses appropriate within Flood Zone 1. In Flood Zone 2, it is advised that 'essential infrastructure', 'water compatible developments', 'less vulnerable' and 'more vulnerable' uses are appropriate. 'Highly vulnerable' uses are only appropriate in Zone

2 if the Exceptions Test is passed. In Flood Zone 3a 'water compatible' and 'less vulnerable' uses are appropriate. 'More vulnerable uses' should only be permitted if the exception test is passed.

- 4.10 Flood Risk Vulnerability Classification, confirms that residential development is a 'more vulnerable use'. Residential development on the Application Site is, therefore, only appropriate subject to the Sequential Test and Exception Test being passed.

LOCAL POLICY

- 4.11 Policy CS15 Flood and Coastal Erosion Risk. "Development in areas at risk of flooding now and in the future as identified on the latest Environment Agency flood risk maps and Strategic Flood Risk Assessment climate change maps will only be permitted where:

1. It meets the sequential and exception test (where required) in relation to PPS25.
2. The site is in a low hazard area as defined in the Strategic Flood Risk Assessment.
3. A site-specific flood risk assessment demonstrates that the development will be safe, including the access, without increasing flood risk elsewhere, and, where possible, will reduce flood risk overall.
4. The scheme incorporates flood protection; flood resilience and resistance measures appropriate to the character and biodiversity of the area and the specific requirements of the site.
5. Appropriate flood warning and evacuation plans are in place.
6. New site drainage systems are designed taking account of events which exceed the normal design standard.
7. It meets the sequential and exception test (where required) in relation to PPS25.

All development will be required to ensure that there is no net increase in surface water run-off. Priority should be given to incorporating Sustainable Drainage Systems (SuDS) to manage surface water drainage, unless it is proven that SuDS are not appropriate. Where SuDs are provided, arrangements must be put in place for their whole life management and maintenance".

- 4.12 No specific guidance on the methodology for identifying a 'reasonable' sequential test search area and criteria for assessing alternative sites is provided.

SUMMARY

- 4.13 Relevant policy set out at national and local level confirms that more vulnerable uses such as residential can be considered acceptable in areas of higher flood risk (namely Zones 2 and 3) provided that the scheme is demonstrated to comply with the sequential assessment and exception test. No specific methodology or guidance on how the tests are to be undertaken is provided
- 4.14 The Local Plan in Policy CS15 confirms that development on sites vulnerable to flood risk may be considered acceptable on the basis that the sequential and flood tests are met and site specific measures are in place. The EA correspondence confirms that the

scheme proposals are acceptable in terms of design to address any identified flood risk. No specific methodology or guidance on how the tests are to be undertaken is provided

- 4.15 At a national and local level guidance on how to carry out the sequential test is vague, with most defaulting to the District Boundary, this is not practical or reasonable in many instances. However, there is some guide guidance available produced by Local Planning Authorities (LPA) to help define a 'reasonable' sequential test search area and list of criteria, which an alternate site must meet to become a viable alternative. Bristol City Council, Flood Risk Sequential Test (August 2013), is probably the most comprehensive set of guidance on sequential testing developed by a LPA. Other authorities have defined search areas that break down their administrative area in to smaller sections. The Lake District National for example have a set of discrete areas within their boundary such as "north east" and "central". In some authorities, such as Rother alternative site search areas are narrowed to those considered under the Strategic Housing Land Availability Assessment (SHLAA) areas, as this provides a 'reasonable' basis for comparison.
- 4.16 A number of extracts from the Bristol City Council Sequential Test Guidance is provided below, this provides a context to why more concentrated sequential test areas are acceptable, ways of identifying suitable sites and how these can be assessed as 'reasonably viable'.

"2.2.1. Defining the search area

Bristol contains a number of areas in need of regeneration in which it would be appropriate to carry out the Sequential Test over a smaller area. Development in the following areas will not be expected to look for alternative sites in other parts of the city as part of the Sequential Test:

2.2.2. Identifying alternative sites

The Sequential Test requires any alternative sites within the search area that are at lower risk of flooding and would be appropriate for the proposed development to be identified.

Alternative sites for major proposals of 10 or more dwellings or over 1,000m² of non-residential floorspace can be identified from the council's emerging Local Plan documents and the evidence produced to support them, particularly the Strategic Housing Land Availability Assessment (SHLAA).

Alternative sites for small-scale proposals of fewer than 10 dwellings or less than 1,000m² of non-residential floorspace cannot readily be identified from the above sources. Applicants wishing to pursue a proposal on such a site may instead gather evidence for a Sequential Test by consulting local property agents' listings. It is recommended that a minimum of two property agents be consulted.

2.2.3. Determining whether alternative sites are 'reasonably available'

A development proposal will only fail to pass the Sequential Test if alternative sites are identified within the search area that are at lower risk of flooding, would be appropriate for the proposed development and are 'reasonably available' for development. A site is only considered to be reasonably available if it is both 'deliverable' and 'developable' as defined by the NPPF (Para.47, footnotes 11-12).

Additionally, a site is only considered to be reasonably available if **all** of the following apply:

- The site is within the agreed area of search.
- The site is of comparable size and can accommodate the requirements of the proposed development.
- The site is either:
 - Owned by the applicant;
 - For sale at a fair market value; or
 - Is publicly owned land that has been formally declared to be surplus and is available for purchase.
 - The site is not safeguarded in the Local Plan for another use.

Sites are *not* considered to be reasonably available if they fail to meet any of the above requirements or already have planning permission for a development that is likely to be implemented.”

5 SCOPE OF AND SEQUENTIAL ASSESSMENT FINDINGS

AREA OF SEARCH

- 5.1 The proposed area of search for sequentially preferable sites is focused upon Hayling Island as this is defined as a ‘distinct area’ in the Council’s SHLAA (2017) and Core Strategy (March 2011). The area of search approach is picking up the guidance themes in the Bristol City and Rother approach to why a more concentrated search can be considered acceptable for both regeneration need and practical purposes.
- 5.2 The Core Strategy recognises that Hayling Island is geographically contained, access on and off the island is often difficult and contributes to its sense of isolation from the rest of Havant Borough Council. This has implications in terms of employment generation, regeneration requirements identified on South Hayling and provision of a more diverse housing offer. There are very real and practical reasons why the area of search needs to be focused on Hayling Island and not a wider Borough approach.
- 5.3 The applicant is a keen sailor and has a boat docked in Sparkes Marina on the south-east of the island, thus contributing to the local maritime industry and community. The applicant works from home approximately 2 days per-week, which also helps contribute to the local economy and has practical implications in relation to a more sustainable approach to his lifestyle requirements as promoted by Local Plan policy. The considerable restrictions with regards to access to the island are a key constraint and the applicant would have to move outside of the Borough Area if living on the island was not a possibility. The loss of economically active residents that contribute to the maritime and wider community is against the key regeneration and planning objectives of the local plan policy, any flood impact considerations must be balanced against this.

SIZE OF SITES TO BE ASSESSED

- 5.4 The proposed development comprises a single two bedroom residential dwelling on a site of some 504sqm. In terms of comparable site sizes to be assessed the Wyre Council Flood Risk Sequential Test: Advice for Applicants, May 2015, sets out the following suggested approach:

“The Council will normally apply a +/-10% buffer to create a range within which comparator sites can be identified. For example, if site capacity is used as the basis for determining comparability, a residential scheme of 20 dwellings would generate a comparator site threshold of 18-22 dwellings.

On the same basis, a scheme on 0.6ha of land would generate a comparator site threshold of 0.54ha to 0.66ha. The method used will depend on the circumstances of the site and proposal. For higher density developments, for instance flats, the size threshold should normally be used. For lower density developments, for instance large detached houses, the site capacity should normally be used. For residential development, in some cases, the Council may wish to apply both site capacity and site size parameters.”

- 5.5 Based on this approach the sequential approach will look at sites capable of delivering one detached residential unit on a site of between 450-550 sqm.

IDENTIFICATION OF SITES

- 5.6 Sites will be identified through a review of commercial websites Rightmove and Zoopla, that include a broad range of all agents active on the island and beyond and by contacting local agents to determine what sites are available for sale or known to them to have a potential for sale in the near future on Hayling Island. Responses from local agents are included in Appendix 1.
- 5.7 As the site is below the threshold for the Council’s Strategic Housing Land Availability Assessment and adopted Development Plan these are not a suitable source for reference. Sites identified in the emerging Draft Havant Local Plan 2036 on Hayling Island are also above the required site proposal size and are not considered suitable as an alternative, they also do not necessarily have a designated development designation.

CRITERIA FOR DISCOUNTING SEQUENTIALLY PREFERABLE SITES

- 5.8 In assessing sites in lower flood risk zones, we propose to discount sites when assessed against the following criteria (taken from Wyre Council Flood Risk Sequential Test: Advice for Applicants: May 2015) namely:
- If the site is greenfield;
 - If the site is the subject of a current planning application or planning permission for a development which does not accord with the proposed development;
 - If there are ecological constraints which would preclude the comprehensive redevelopment of the site;
 - Inappropriate neighbouring uses which would warrant the redevelopment of the site for the proposed dwelling unacceptable;
 - A Development Plan allocation for uses which do not accord with the proposed development;
 - Access constraints;

- Topographical constraints, such as severely undulating topography, which could preclude the successful redevelopment of the site;
- The presence of Conservation Area or listed building constraints which could preclude the development of the site;
- A site configuration which would render the site unsuitable for the proposed development scheme e.g. a very narrow strip of land; and
- Any other unique site-specific considerations that could warrant the site unsuitable.

SEQUENTIALLY PREFERABLE SITES IDENTIFIED

5.9 The results of the sequential test exercise are presented in a tabulated format below: identifying the subject site, its site area and capacity, flood zone and a commentary explaining why the site has been discounted, as appropriate.

Site Name	Area/ Capacity	Flood Classi	Status of Site	Available	Overall Assessment
Victoria Road Hayling island-	2,73 acres	Zone 3	Greenfield	No – under offer	Greenfield land in Flood Zone 3, less suitable than application site; not available. Discounted
36,38 & 40 Station Road and 1 West Lane, Haylin g Island, P011 0EQ	13 – 2 bed flats, 4 1-bed 1-3 bed	Zone 1	Brownfield/ Commercial	Yes - market ed	Mixed Retail and Residential Development Site, located Station Road where it meets West Lane. The existing premises on site would need to be demolished. Consent for 13 two bed flats, 4 one bed flats and 1 three bed flat plus 3 retail units (Planning Class A1). Site is too large and not viable for the development sought. Discounted
Suntrap gardens, Seafront, Hayling Island		Zone 1	Brownfield/ Commercial	Yes - market ed	Hugh Hickman and Son marketing sale of development site. The property is situated close to the West Town Shopping Centre a short distance from the Seafront. The property has recently been granted planning permission, (app/1700278, A1 retail to C3 residential), to be turned into five one bedroom flats with parking to the rear. This comprises two flats on the ground floor, (both with courtyard gardens), two flats on the first floor and one flat on the top floor. Site is too large and not viable for the development sought. Discounted

Elm Grove, Hayling Island	6 – 2 bed holiday flats	Zone 1	Brownfield	Sold	Freehold site being sold with planning consent for six, two bedroom holiday flats. Planning Application APP\16\00720- Copy of plans available at the Hayling Island Office - Mains services connected to site. Site is too large, not viable for the development sought and no longer available. Discounted
Nutbourne Road, Hayling Island	2 caravan	Zone 3	Holiday caravans	On market	Two single freehold caravan sites at £90,000 each to be sold separately licensed for seasonal use 1st March to 31st October. Not suitable for permanent residential development and in flood zone. Discounted
Shotton Court 19-23, Creek Road, Hayling Island, PO11 9QZ				Sold?	Planning rights to 2 x 2 bedroom flats and 1 x 3 Bedroom flat at Shotton Court and Rapley House Creek Road, Hayling island. Not suitable for proposed development and no longer on the market. Discounted
Vacant Plat?				Sold?	A vacant plot of land A vacant plot of land, formerly used as a site for two, seasonal caravans. Not suitable for residential use and no longer on the market. Discounted
Yacht Haven, Copse Lane, Hayling Island, PO11 0RH	16 acres	Zone 3	Commercial purposes, to include a boat store and slip way.	For sale	The subject property is located off a private road from Copse Lane. The site, comprises: 7 acres of non tidal land 9 acres of tidal land Commercial site in flood zone 3, too large and not suitable for proposed development. Discounted

5.10 Area to north of Hayling Island in Havant Borough – Although not part of the proposed area of the sequential search the applicant did undertake an initial Rightmove and Zoopla search and asked local agents for any details of known suitable sites and land in the wider Borough area. No suitable alternative sites of the required size or ones that could be considered deliverable were identified.

- 5.11 As a result of the sequential assessment it is concluded that no suitable alternative sites are available within the search area where the applicant could reasonably undertake to deliver the proposed development.

6 EXCEPTION TEST

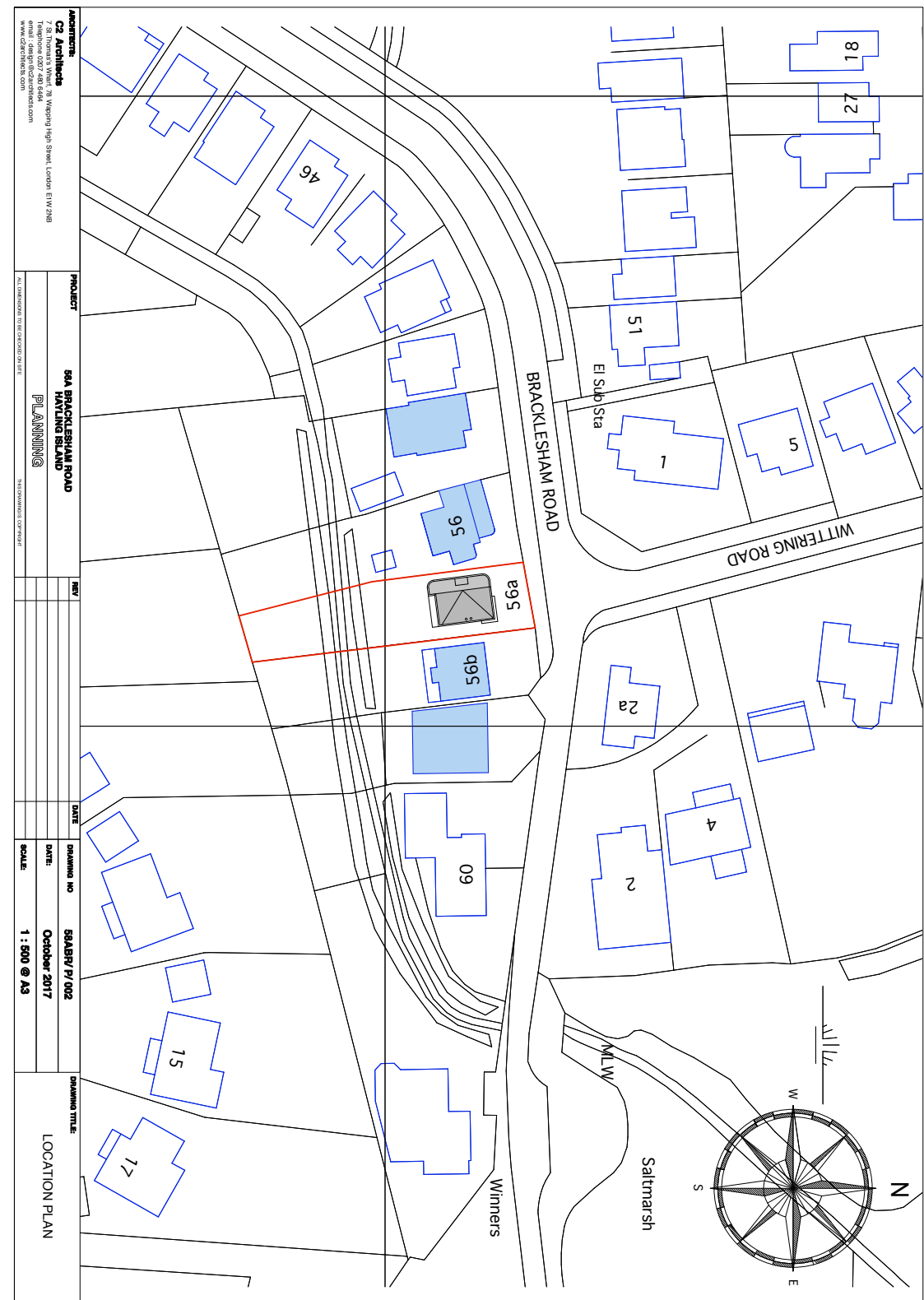
- 6.1 The NPPF states that if following application of the Sequential Test, it is not possible or consistent with wider sustainability objectives for the development to be located in zones with a lower probability of flooding, the Exception Test can be applied if appropriate.
- 6.2 For the Exception Test to be passed, it must be demonstrated that the development provides wider sustainability benefits to the community that outweigh flood risk, and a site-specific flood risk assessment must demonstrate that the development will be safe for its lifetime taking account of the vulnerability of its users, without increasing flood risk elsewhere.
- 6.3 The applicant has therefore considered whether the proposed development passes the Exception Test. The principal reasons why we consider it does are set out below:
- The scheme proposes a single residential dwelling on a site that has been created by earlier planning consents on previous garden land. This will enable the regeneration of a land asset that has remained vacant since 2015;
 - When the applicant purchased the site the drainage ditch that dissects the site was in a state of disrepair and blocked with rubbish. Significant investment was required to clear the ditch to ensure the rubbish was not a flood hazard. By constructing the new dwelling on the site, it will become the responsibility of the home owner to manage and maintain the ditch; overall providing betterment over the existing situation and reducing the risk of flooding to the properties adjacent to the ditch. If planning consent for the proposed development is not granted, then there is the real risk that the site and drainage channel will fall into a poor state of repair, fly tipping will continue, vermin will return and travelers or other uninvited guests may find their way onto the site; thus, significant detrimental impacts on adjoining properties may arise.
 - As part of the proposed development the applicant will implement a sensitive landscape scheme to include indigenous plant species, this will enhance the character of the site and wider area and provide ecological benefit over the existing situation.
 - The proposed development accords with the prevailing planning policy in terms of the NPPF (not least due to its sustainable credentials), the Development Plan and the emerging policies;
 - The proposed development will provide a high quality, attractive residential dwelling that responds to the site and surrounding context;
- 6.4 The submitted Flood Risk Assessment is site-specific and demonstrates that the development will be safe for its lifetime as a residential development without increasing flood risk elsewhere. This was accepted, with the imposition of a condition on any subsequent planning consent, by the Environment Agency in their letter of 01 December 2017.

7 CONCLUSION

- 7.1 As the proposed development falls within Flood Zone 3, a Sequential Assessment has been undertaken in accordance with the NPPF and its accompanying practice guidance.
- 7.2 On the basis of the above information, the applicant asserts that there are no sequentially preferable sites to accommodate the proposed development.
- 7.3 As such, the Exception Test in accordance with the NPPF and accompanying guidance has been applied. The proposed development will generate significant and obvious sustainability benefits and will be delivered in a manner which will not result in an increased flood risk either on or off-site.
- 7.4 Accordingly, the proposed scheme passes the Sequential and Exception tests. There is no reason why the application should be refused in these terms.

APPENDIX 1

Site Location Plan



APPENDIX 2

Environment Agency Response – 1 December 2017

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

Our ref: HA/2017/119926/01-L01
Your ref: APP/17/01179
Date: 01 December 2017

Dear Sir/Madam

1no 2 bed detached dwelling with garage and off street parking.

56A Bracklesham Road, Hayling Island, PO11 9SJ

Thank you for consulting the Environment Agency on the above application which was received on 11 November 2017.

Environment Agency Position

We have **no objection** to the proposed development as submitted, **subject to the inclusion of the following condition**, in any permission granted.

We consider that planning permission could be granted to the proposed development, as submitted, if the following planning condition is included as set out below. Without this condition, the proposed development on this site poses an unacceptable risk to the environment and we would object to the application.

Condition – Implementation of Flood Risk Assessment

The development permitted by this planning permission shall only be carried out in accordance with the approved Flood Risk Assessment (FRA) and the following mitigation measures detailed within the FRA.

- All habitable living accommodation shall be located at first floor level or above. The first floor level should be set no lower than 3 metres above existing ground levels (paragraph 1.7 and 7.4 of FRA.)
- Internal access is to be provided throughout the dwelling to provide an area of safe refuge on the upper floors of the property (paragraph 1.7 of FRA.)
- The provision of flood resilient construction measures has been submitted with the FRA and a site specific flood warning and evacuation plan is in place and to be implemented (section 7 of FRA.)

Reasons

To ensure the safety of the development and future occupants in line with section 9 of the Planning Practice Guidance to the National Planning Policy Framework (NPPF) for Flood Risk and Coastal Change.

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

Advice to Local Planning Authority/Applicant

The proposed development is located within tidal flood zone 3 and is considered to have a high probability of flooding (>0.5%, 1 in 200) from the sea in any year. The current 1 in 200 year tide level is given as 3.3mAOD, rising to 4.5mAOD by 2115, when considering the effects of climate change and sea level rise. We note that the site could be subject to significant depths of flooding over its lifetime with worst case flood depths of 4.5mAOD which makes ground floor of the building is subject to inundation.

The road levels are identified as 2.92 mAOD. Therefore, safe access to and from the building will not be possible in case of flooding. As a result, emergency services may not be able to operate and the safety occupants will be reliant on safe refuge within the building or prior evacuation.

The Local Planning Authority (LPA) needs to be satisfied that safe refuge within the building is adequate and that the building will remain structurally sound given the potential depth of flooding possible at the site.

The LPA may decide that in the absence of safe access and egress, the risk to the users of the development can be mitigated by alternative means. In coming to a decision on the proposed development, the LPA should therefore give careful consideration, in consultation with relevant specialists, to the mitigation measures proposed. Specifically, consideration should be given to whether or not the availability of safe refuge, the submitted flood response plan contained within the FRA and recommended resilience measures would enable users of the development to avoid the flood hazards identified.

If the LPA is not satisfied, taking into account all relevant considerations, that the proposed development can be considered safe without the provision of safe access and exit then planning permission should be refused.

The Environment Agency will support the decision of the LPA on flood risk matters and should the LPA be minded to refuse the application on the grounds that the mitigation proposed is not considered satisfactory the Environment Agency would provide our full support at appeal.

In reviewing the site flood response plan, we recommend that the LPA consult their emergency planners, the emergency services and the Local Resilience Forum. It is essential that this consultation takes place prior to the granting of planning permission, as the agreement and securing of a suitable flood response plan will be crucial for the safety of the development.

Should you have any further queries please do not hesitate to contact me on the number below.

Yours faithfully

Mr David Griggs
Planning Advisor

Direct dial 02030 259625
Direct e-mail PlanningSSD@environment-agency.gov.uk

End

2

Local Agent Correspondence



19 Mengham Road, Hayling Island, PO11 9BG
T 0238 220 0312

Best Price Guide

Presented by Millers of Hayling, Hayling

This **Best Price Guide** provides comparable property information selected by Millers of Hayling to help establish the best market price.

Selection Criteria

Postcode:	PO11
Marketed by:	All agents
Date From:	04-01-2017
Date To:	05-01-2018

This guide was created using data supplied by Rightmove, which has over 20,000 members who advertise over 1,120,000 properties for sale or rent in the UK and Overseas.

EXCLUSIVE TO AGENTS WHO ADVERTISE ON RIGHTMOVE



Best Price Guide - Presented by Millers of Hayling, Hayling*



Millers of Hayling, Hayling. 19 Mengham Road, Hayling Island, PO11 9BG
Telephone: 0238 220 0312
Email: office@haylingproperty.co.uk

*The below properties were advertised on Rightmove.co.uk during the dates specified. These properties were not marketed by Millers of Hayling, Hayling unless otherwise stated.

Properties shown on map



The icons indicate the centre of the postcode and not necessarily the exact location



Offers in Excess of £1,000,000

**36,38 & 40 Station Road and 1 West Lane,
Hayling Island, PO11 0EQ**
0 bedroom residential development

Mixed Retail and Residential Development Site, located within the popular Station Road where it meets West Lane. The existing premises on site would need to be demolished. Consent for 13 two bed flats, 4 one bed flats and 1 three bed flat plus 3 retail units (Planning Class A1).

Invisible



Marketed from **10 Apr 2017**



£360,000

Seafront, Hayling Island
0 bedroom residential development

Hugh Hickman and Son are very pleased to offer for sale this rare opportunity to purchase an investment such as this.

For Sale



Marketed from **10 Nov 2017**



£195,000

Elm Grove, Hayling Island, Hampshire
0 bedroom land

Freehold site being sold with planning consent for six, two bedroom holiday flats. Planning Application APP\16\00720- Copy of plans available at the Hayling Island Office - Mains services connected to site.

Archived



Marketed from **19 Aug 2016 to 02 Jun 2017 (288 days)**



Sold Price History

The sold price history information is provided by Her Majesty's Land Registry and the Registers of Scotland and is matched to Rightmove properties by house number and full postcode. Please note there is not always a match.

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Best Price Guide - Presented by Millers of Hayling, Hayling*



Millers of Hayling, Hayling. 19 Mengham Road, Hayling Island, PO11 9BG
Telephone: **0238 220 0312**
Email: **office@haylingproperty.co.uk**

*The below properties were advertised on Rightmove.co.uk during the dates specified. These properties were not marketed by Millers of Hayling, Hayling unless otherwise stated.



£90,000

**Nutbourne Road, Hayling Island,
Hampshire**
0 bedroom land

Two single freehold sites at £90,000 each to be sold separately licensed for seasonal use 1st March to 31st October. The location is perfectly positioned so you are only a short distance from the sea. (contd...)

Sold Price History: 09 November 2007: £125,000 28 May 1999: £18,000 11 December 1996: £12,000

For Sale **4**

Marketed from **06 Sep 2016**



Guide Price £90,000

**Shotton Court 19-23, Creek Road, Hayling
Island, PO11 9QZ**
7 bedroom plot

Property number 33688. Unique opportunity to purchase the planning rights to 2 x 2 bedroom flats and 1 x 3 Bedroom flat at Shotton Court and Rapley House Creek Road, Hayling Island.

Marketed from **10 Feb 2016 to 15 Sep 2017 (584 days)**

Archived **5**



£65,000

A vacant plot of land
0 bedroom land

A vacant plot of land, formerly used as a site for two, seasonal caravans and may have potential for other uses. Situated at South-East Hayling, a short walk from Eastoke corner shops and the Seafront. Gated access from road, about 12' wide, ditch and trees on the south side do not form...

Marketed from **29 Apr 2016 to 23 Jan 2017 (270 days)**

Archived **6**

Marketed by Millers of Hayling, Hayling. Telephone 0238 220 0312.

rightmove

Sold Price History

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15 North Street, Emsworth, PO10 7BY
T 0333 987 3521 F 01243 372266



Best Price Guide

Presented by Henry Adams, Emsworth

This **Best Price Guide** provides comparable property information selected by Henry Adams to help establish the best market price.

Selection Criteria

Search Radius:	0.25 miles
Postcode:	PO11 9SJ
Min Price:	£100,000
Max Price:	£500,000
Marketed by:	All agents
Date From:	12-10-2012
Date To:	13-01-2018

This guide was created using data supplied by Rightmove, which has over 20,000 members who advertise over 1,120,000 properties for sale or rent in the UK and Overseas.

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(https://google.com/+Tixuz)

(https://youtube.com/Tixuz)

Land for sale in Land South Side Of Victoria Road, Hayling Island, Hampshire PO11

140,000 GBP Country: England, Region: Hampshire, 07-04-2017



(/gallery/2/9591457)



(/gallery/2/9591457)

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Victoria Road is a turning off the main Havant Road and is populated on the northern side by detached dwellings, while the southern side of the road is at present used as grazing land. This parcel of 1.08 hectares (2.67 acres) is considered to have future potential for development, subject to all necessary consents being obtainable. Interested applicants are advised to make their own

For Sale 



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Land To Buy In Hayling Island

- For Sale - Land



£90,000
Fee free
mortgage
advice
Home
Valuation

Two single freehold
sites at 90,000 each
to be sold

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Land Hayling Island **NEW**



£90,000

Hayling Island - Land
rare homes for sale from
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the hayling island...
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Foreclosure Process Tax
★★★★★ rating for about.com

Land For Sale Nutbourne Road Hayling Island



£90,000

North Hayling, Hampshire -
For Sale
Are only a short distance from
the sea. If you are a boat lover
the hayling island...

19 Dec 2017 in
PropertyPigeon

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Check out essential info on Ask.com

Destinations: Leeds, London, Manchester, Liverpool

Hayling Island Houses For Sale - Find The Perfect Home Online

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122 Houses Available For Sale In Your Area. View

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If you have a £250,000 portfolio download the guide for retirees written by money manager Ken Fisher's firm. It's called "The 15-Minute Retirement Plan." Even if you have something else in place right now, it still makes sense to request your guide.

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