

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

Our ref: HA/2017/119824/01-L01
Your ref: APP/17/01000
Date: 24 October 2017

Dear Sir/Madam

ERECTION OF 1NO. 5 BED DETACHED DWELLING (FOLLOWING DEMOLITION OF EXISTING)

59 SANDY POINT ROAD, HAYLING ISLAND, HAMPSHIRE, PO11 9RR

Thank you for consulting the Environment Agency on the above planning application which we received on 5 October 2017.

Environment Agency Position

We can confirm that the Environment Agency has no objection in principle to the proposed development as submitted; however, we request that the following planning condition(s) be attached to any planning permission granted in order to make the development acceptable. Without these conditions, the proposed development on this site poses an unacceptable risk to the environment and we would object to the application.

Planning Condition(s):

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) (undertaken by lilleyarchitecture) and the following mitigation measures detailed within the FRA:

- 1. *Provision of compensatory flood storage: As stated in section 3 of the FRA, a sub floor void will be included into the design build, allowing the sub floor to flood during an event.***
- 2. *Finished floor levels: As stated in section 3 of the FRA, FFL must be set no lower than 650mm above the external ground levels. Finished floor levels will therefore be set 300mm above the existing finished floor levels.***
- 3. *Sleeping accommodation: As stated in section 3 of the FRA and the Proposed Plans (drawing number 385 PL05), all sleeping accommodation must be restricted to the first floor or above. There must be no ground floor sleeping accommodation.***

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

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4. Building Construction: As stated in section 3 of the FRA, the building must be built of flood resilient materials.

The mitigation measures shall be fully implemented prior to occupation and subsequently in accordance with the timing / phasing arrangements embodied within the scheme, or within any other period as may subsequently be agreed, in writing, by the local planning authority.

Reason

To prevent flooding elsewhere by ensuring that compensatory storage of flood water is provided and to reduce the risk of flooding to the proposed development and future occupants.

This condition is in line with Section 9 of the Planning Practice Guidance to the National Planning Policy Framework (NPPF) for Flood Risk and Coastal Change and Policy CS15 Flood and Coastal Erosion Risk of the Havant Borough Council Core Strategy 2011.

Advice to Local Planning Authority / Applicant:

Sequential Test:

Our response to this planning application is on the understanding that Havant Borough Council is satisfied that the Sequential Test has been adequately demonstrated to the requirements set out in the National Planning Policy Framework (NPPF) Paragraph 101 and Section 5, Paragraph 019 of the NPPF Planning Practice Guidance.

This means that before proceeding to a determination, Havant Borough Council must apply the Sequential Test; that is, it must consider whether the applicant has demonstrated and sufficiently justified that no alternative sites are available in a lower flood risk zone.

Our comments in relation to elements of the Exception Test do not negate the requirement to first undertake the Sequential Test. The NPPF Planning Practice Guidance makes it clear that flood resistance and resilience measures should not be used to justify development in inappropriate locations^[1].

Flood Proofing Advice

We recommend that consideration be given to use of flood proofing measures to reduce the impact of flooding when it occurs. Flood proofing measures include barriers on ground floor doors, windows and access points and bringing in electrical services into the building at a high level so that plugs are located above possible flood levels.

Consultation with your building control department is recommended when determining if flood proofing measures are effective.

Additional guidance can be found in our Floodline Publication 'Damage Limitation'. A free copy of this is available by telephoning 0845 988 1188 or can be found on our website www.gov.uk click on 'flood' in subjects to find out about, and then 'floodline'.

^[1] NPPF Planning Practice Guidance, Section 23 paragraph 059 'Flood resilience and flood resistance'.
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Reference should also be made to the Department for communities and local Government publication 'Preparing for Floods' please email: communities@twoten.com for a copy or alternatively go to: <http://www.planningportal.gov.uk/uploads/odpm/4000000009282.pdf> as well as the communities and local Government publication 'Improving the flood performance of new buildings' which can be viewed at:

<http://www.communities.gov.uk/publications/planningandbuilding/improvingflood>

Yours faithfully

Mr Jon Maskell
Planning Advisor, Environment Agency

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