

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

Our ref: HA/2016/118975/01-L01
Your ref: APP/16/01237
Date: 09 January 2017

Dear Sir/Madam

CHANGE OF USE OF LAND FOR THE SITING OF 204 HOLIDAY CARAVANS INCLUDING 5 CARAVANS FOR USE AS STAFF ACCOMMODATION, REFURBISHMENT OF SINGLE AND TWO STOREY HOLIDAY CHALETs TO FORM 87 UNITS OF HOLIDAY ACCOMMODATION, RETAIN MANAGERS BUNGALOW, SALES AREA FOR 5 CARAVANS, REFURBISHMENT OF CENTRAL FACILITIES BUILDING, CCTV CAMERAS, PROVISION OF NEW PEDESTRIAN CONCOURSE WITH TERRACES, SPLASH AND DRY PLAY AREAS, MULTI-GAMES COURT, ADVENTURE GOLF COURSE AND OUTDOOR THEATRE AND NEW LANDSCAPING. RETAINING EXISTING PITCH AND PUTT GOLF COURSE TO THE EAST OF THE SITE.

16 MILL RYTHE HOLIDAY VILLAGE, HAVANT ROAD, HAYLING ISLAND, PO11 0PB

Thank you for consulting the Environment Agency on the above planning application which we received on 21 December 2016.

Environment Agency Position

We can confirm that the Environment Agency has no objection in principle to the proposed development as submitted.

Advice to Local Planning Authority (LPA) / Applicant:

The vulnerability and flood risk to the site and surrounding area will not increase as a result of the proposed development as the number of units will not increase.

As the proposed development comprises the same number of holiday units, the proposed development can be considered as 'like for like' and so there is no increase in vulnerability to the site.

The submitted flood risk assessment (FRA) produced by nijhuis H20K in September 2016 (reference number J-10847) confirms that the present day flood risk from extreme sea levels to the site is 3.3mAOD, rising to 4.5mAOD in 2115.

Finished floor levels are proposed to be no lower than 1.115mAOD. Therefore, over its lifetime the proposed development is subject to internal flood depths of approximately

3.3m. The local planning authority will need to determine if this risk is acceptable.

The applicant proposes to mitigate this risk with a flood evacuation plan. The Environment Agency does not normally comment on or approve the adequacy of flood emergency response procedures accompanying development proposals, as we do not carry out these roles during a flood. Our involvement with this development during an emergency will be limited to delivering flood warnings to occupants/users covered by our flood warning network.

The Planning Practice Guidance to the National Planning Policy Framework (NPPF) for Flood Risk and Coastal Change states that those proposing developments should take advice from the emergency services when producing an evacuation plan for the development as part of the flood risk assessment.

In all circumstances where warning and emergency response is fundamental to managing flood risk, we advise local planning authorities to formally consider the emergency planning and rescue implications of new development in making their decisions.

The applicant acknowledges that the existing defences near the proposed development will only provide a 1 in 200 year standard of protection until 2041. Whilst the FRA acknowledges that the holiday park are the riparian owners of the defence and recommend maintenance at a minimum of every 5 years, it is not clear if agreements are in place to ensure that this maintenance will take place, or if there are any plans to raise the wall in the future.

Advice to Applicant:

Environmental Permit

This development may require a permit under the Environmental Permitting (England and Wales) Regulations 2010 from the Environment Agency for any proposed works or structures, within 16m of a sea defence. This was formerly called a Flood Defence Consent. Some activities are also now excluded or exempt. A permit is separate to and in addition to any planning permission granted. Further details and guidance are available on the GOV.UK website: <https://www.gov.uk/guidance/flood-risk-activities-environmental-permits>.

Yours faithfully

Mr Jon Maskell
Planning Advisor, Environment Agency

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

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