

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

Our ref: HA/2022/124038/03-L01
Your ref: APP/22/00172
Date: 12 September 2022

Dear Sir/Madam

AMENDED FRA - OUTLINE PLANNING APPLICATION FOR PHASED DEMOLITION OF EXISTING BUILDINGS AND THE ERECTION OF NEW FLEXIBLE USE EMPLOYMENT FLOORSPEACE (USE CLASSES E(G)(I)-(III)/B2/B8) AND ANCILLARY USES (USE CLASSES E(B), E(D) AND E(F)); AND ASSOCIATED WORKS. ALL MATTERS RESERVED EXCEPT ACCESS. LANGSTONE TECHNOLOGY PARK, 2B LANGSTONE ROAD, HAVANT, PO9 1SA

Thank you for consulting the Environment Agency on the above application.

We have reviewed the information as submitted and set out our position below.

Environment Agency Position

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:

- take the impacts of climate change into account
 - Whilst the 2082 tidal 1 in 200 year (0.5% AEP) has been correctly considered, there is no assessment of the impact of climate change using appropriate climate change allowances for the fluvial 1 in 100 year (1% AEP) using the central allowance and an appropriate freeboard ['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

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

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make the development resilient to the flood levels for the 2082 1 in 100 year (1% AEP) fluvial event with an appropriate freeboard. Consequently, the development proposes inadequate:

- Raised finished floor levels
- Resistance and resilience measures
- Safe access and egress routes

Overcoming our Objection

To overcome our objection, the applicant should submit a revised FRA which addresses the points highlighted above.

The applicant has stated that the design life for the proposed development is 60 years (2082). The Portsmouth City Council's 'Strategic Flood Risk Assessment map' shows that the site will be vulnerable to both tidal and fluvial flooding by 2085. We are satisfied the included FRA has demonstrated that the site is safe from tidal flooding for the design life of the property. However, the amended FRA has **NOT** considered the 2082 1 in 100 (1% AEP) fluvial event.

The applicant needs to calculate the future fluvial design flood level using:

- The data provided to the applicant by the Environment Agency (included in the FRA within appendix E)
- The current 'East Hampshire Management Catchment peak river flow allowances' 2080 central allowance (37% for 2080)
- Ground levels for the site
- An appropriate freeboard

When the 2082 1 in 100 year (1% AEP) fluvial design flood level has been calculated, the applicant needs to assess if this will overtop the river embankments. If not, the residual risk of flooding should the embankment fail needs to be considered. This could include; raised finished floor levels, resistance and resilience measures, safe access and egress routes.

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.

Floodplain compensation:

Widening of the footpath at the current levels will result in an increase in the floodplain. We are therefore no longer concerned that the works will require floodplain compensation.

Advice to the LPA/Applicant

Flood resistance and resilience

We recommend the use of flood resistance and resilience measures. Physical barriers, raised electrical fittings and special construction materials are just some of the ways you can help reduce flood damage.

To find out which measures will be effective for this development, please contact your building control department. If you'd like to find out more about reducing flood damage, visit the Flood Risk and Coastal Change pages of the planning practice guidance. Further guidance on flood resistance and resilience measures can also be found in:

Government guidance on flood resilient construction

<https://www.gov.uk/government/publications/flood-resilient-construction-of-new-buildings>

CIRIA Code of Practice for property flood resilience

https://www.ciria.org/Research/Projects_underway2/Code_of_Practice_and_guidance_for_property_flood_resilience.aspx

British Standard 85500 – Flood resistant and resilient construction

<https://shop.bsigroup.com/ProductDetail/?pid=000000000030299686>

Advice to Applicant

FRA sources of information

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. The types of information are found here <https://www.gov.uk/guidance/flood-risk-assessment-for-planning-applications#get-information-to-complete-an-assessment>.

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>.

Guidance to assess future flood risk

Planning practice guidance provides advice on what is considered to be the lifetime of the development in the context of flood risk and coastal change (see ref ID: 7-026-20140306).

The Environment Agency guidance '[Flood risk assessments: climate change allowances](#)' provides allowances for future sea level rise, wave height and wind speed to help planners, developers and their advisors to understand likely impact of climate change on coastal flood risk. It also provides peak river flow and peak rainfall intensity allowances to help planners understand likely impact of climate change on river and surface water flood risk.

Environmental Permit

The Environmental Permitting (England and Wales) Regulations 2016 require a permit or exemption to be obtained for any activities which will take place:

on or within 8 metres of a main river (16 metres if tidal)

on or within 8 metres of a flood defence structure or culverted main river (16 metres if tidal)

on or within 16 metres of a sea defence

involving quarrying or excavation within 16 metres of any main river, flood defence (including a remote defence) or culvert

in a floodplain more than 8 metres from the river bank, culvert or flood defence structure (16 metres if it's a tidal main river) and you don't already have planning permission

For further guidance please visit <https://www.gov.uk/guidance/flood-risk-activities-environmental-permits> or contact our National Customer Contact Centre on 03708 506

506 (Monday to Friday, 8am to 6pm) or by emailing enquiries@environment-agency.gov.uk.

The applicant should not assume that a permit will automatically be forthcoming once planning permission has been granted, and we advise them to consult with us at the earliest opportunity.

Signing up for flood warning

The applicant/occupants should phone Floodline on 0345 988 1188 to register for a flood warning, or visit <https://www.gov.uk/sign-up-for-flood-warnings>. It's a free service that provides warnings of flooding from rivers, the sea and groundwater, direct by telephone, email or text message. Anyone can sign up.

Flood warnings can give people valuable time to prepare for flooding – time that allows them to move themselves, their families and precious items to safety. Flood warnings can also save lives and enable the emergency services to prepare and help communities. For practical advice on preparing for a flood, visit <https://www.gov.uk/prepare-for-flooding>. To get help during a flood, visit <https://www.gov.uk/help-during-flood>. For advice on what to do after a flood, visit <https://www.gov.uk/after-flood>.

Please do not hesitate to contact me using the contact details shown below should you have any queries regarding the above information.

Yours faithfully

Mrs Sophie Brown
Sustainable Places Planning Advisor

Direct dial 0203 0257 250

Direct fax Direct e-mail planningSSD@environment-agency.gov.uk