

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

Our ref: HA/2024/126293/01-L01
Your ref: APP/24/00746
Date: 14 November 2024

Dear Sir/Madam

DEMOLITION OF EXISTING BUNGALOW AND ERECTION OF NEW TWO STOREY REPLACEMENT DWELLING INCLUDING SOLAR PANELS AND FLOOD DEFENCES.

24 TRELOAR ROAD, HAYLING ISLAND, PO11 9SE

Thank you for the consultation on the above application, please quote our reference on all correspondence.

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(s)

The submitted FRA (*FLOOD_RISK_ASSESMENT-2016856.pdf*) dated 19th August 2024) does not comply with the requirements for site-specific flood risk assessments, as set out in paragraphs 20 to 21 of the Flood Risk and Coastal Change planning practice guidance and its site-specific flood risk assessment checklist. 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 adequately
- consider how people will be kept safe from the identified flood hazards
- 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
- Flood risk mitigation measures to address flood risk for the lifetime of the development included in the design are inadequate because they will not make

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

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the development resilient to the flood levels for a 1 in 200-year tidal flood event for the lifetime of the development (100 years for residential). 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.

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.

Advice to Applicant

In Section 4.13 of the FRA, it identifies the extreme future sea levels as 4.64mAOD for a 1 in 200-year tidal flood event, plus climate change for the lifetime of the development (100 years for residential). Due to the high flood depths identified, over 3 metres, we are concerned that the flood depths will inundate both the ground and proposed first floors. Therefore, the adequacy of a safe refuge and the flood resistance and resilience measures mentioned will not provide safety to the occupants for the lifetime of the development within these conditions. We require the applicant to correct the inaccuracies found within the submitted design plan (ref: *PROPOSED_WEST_FRONT_ELEVATION-2016864.pdf*) and ensure that the listed mitigation measures are set at the elevations as stated within the FRA.

In Section 5.6 of the FRA, the mitigation measures listed stated that '*the external walls will be tanked using Visqueen Torch-On Tanking Membrane to 1.5m above the FFLs (1.46m AOD 1.5m, based on LiDAR data)*' and '*All ground floor windows are set to 1.5m above the FFLs (1.46m AOD 1.5m, based on LiDAR data)*'. This is not evident in the supporting design plan (ref: *PROPOSED_WEST_FRONT_ELEVATION-2016864.pdf*), where they are set at only 0.6mAOD.

In Section 5.6 of the FRA, it states that the decided freeboard allowance used will be the minimum, set at 300mm above the design flood level for the first floor. As this is the minimum allowance, we request that the applicant provides justification for this decision and demonstrate this within their revised design plan (ref: *PROPOSED_WEST_FRONT_ELEVATION-2016864.pdf*).

The applicant needs to provide an appropriate site-specific freeboard allowance, inclusive of climate change. It is up to the applicant to demonstrate and provide evidence to justify their freeboard allowance. Raised finished floor levels should then be calculated accordingly. Further information can be found here - [Accounting for residual uncertainty: an update to the fluvial freeboard guide - GOV.UK \(www.gov.uk\)](https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/612212/Accounting_for_residual_uncertainty_an_update_to_the_fluvial_freeboard_guide.pdf)

Advice to LPA/Applicant

We would not normally object to a replacement dwelling, especially as the applicant intends to create a betterment to the existing dwelling and risk associated with the site. However, in this instance, we believe that due to the high future flood levels referenced within your FRA (4.64mAOD), the ground floor levels are expected to reach high depths

of over 3 metres. We are concerned that the high flood depths, it is likely that the flood water will inundate the first floor, which will compromise the adequacy of a safe refuge. The high flood depths pose a danger to the development and its occupants for the lifetime of the development, and we require that the applicant submit a proposal appropriately addressing measures for the level of flood depths and correct the inaccuracies found within the design plans provided.

The following issues are not within our direct remit or expertise, but nevertheless are important considerations for managing flood risk for this development. Prior to deciding this application, we recommend that consideration is given to the issues below. Where necessary, the advice of relevant experts should be sought.

- Details and adequacy of flood proofing and other building level resistance and resilience measures
- Details and adequacy of an emergency plan
- Provision of and adequacy of a temporary refuge
- Details and calculations relating to the structural stability of buildings during a flood

We strongly 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 f or property flood resilience .aspx](https://www.ciria.org/Research/Projects%20underway2/Code%20of%20Practice%20and%20guidance%20for%20property%20flood%20resilience.aspx)

British Standard 85500 – Flood resistant and resilient construction
<https://shop.bsigroup.com/ProductDetail/?pid=000000000030299686>

We do 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.

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. As such, we recommend you refer to '[Flood risk emergency plans for new development](#)' and undertake appropriate consultation with your emergency planners and the emergency services to determine whether the proposals are safe in accordance with paragraph 167 of the NPPF and the guiding principles of the PPG.

We have considered the findings of the flood risk assessment in relation to the likely duration, depths, velocities and flood hazard rating against the design flood for the proposal. We agree that this indicates that there will be:

- A danger for all people (e.g. there will be danger of loss of life for the general public and the emergency services).

This does not mean we consider that the access is safe, or the proposals acceptable in this regard. We remind you to consult with your emergency planners and the emergency services to confirm the adequacy of the evacuation proposals.

Yours faithfully

Miss Suz Greenwood
Planning Advisor, Environment Agency

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