

Havant Borough Council
Planning Team
Civic Offices Civic Centre Road
Havant
Hampshire
PO9 2AX

Our ref: HA/2022/124564/01-L01
Your ref: APP/22/00769

Date: 28 October 2022

Dear Planning Team,

**ERECTION OF TWO DWELLINGS WITH NEW ACCESS DRIVE TO THE REAR OF
EXISTING DWELLING AT 193 HAVANT ROAD, HAYLING ISLAND.**

LAND REAR OF 193 HAVANT ROAD, HAYLING ISLAND, PO11 0LG

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

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

Reasons

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:

- Provides details of Finished Floor Levels (FFLs) compared to 1 in 200 year return period plus climate change tidal flood levels for the lifetime of the development
- consider how people will be kept safe from the identified flood hazards
- consider how a range of flooding events (including extreme events) will affect people and property
- Consider the requirement for flood emergency planning including flood warning and evacuation of people for a range of flooding events up to and including a 1 in 200 year return period plus climate change event

- Take the impacts of climate change into account
 - There is no assessment of the impact of climate change using appropriate

climate change allowances for a 1 in 200 year return period plus climate change for the lifetime of the development (100 years)

- 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 the development resilient to the flood levels for a 1 in 200 year return period plus climate change event. 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 should:

- Provide FFLs in metres Above Ordnance Datum for both dwellings. These can then be compared with the tidal flood levels including climate change for lifetime of the development.
- Request “Product 4” flood data (including climate change) from the Environment Agency so FFLs can be compared with flood levels to ensure the development is safe for its lifetime
- The design level of resistance and resilience measures should be set out in accordance to flood levels as above
- Sign up to the Environment Agency Flood Warning service
- Develop a Flood Warning Evacuation Plan
- The application fails to incorporate any climate change allowances, therefore failing to show that the development will be safe for its lifetime, both in terms of the property and its inhabitants. When considering the impacts of climate change there is guidance specific to planning which can be found at '[Flood risk assessments: climate change allowances](#)'. Applying these allowances will result in future flood levels higher than current flood levels.
- The latest tidal flood levels from our models can be obtained by requesting a free Product 4 from our enquiries team on SSDEnquiries@environment-agency.gov.uk. Please provide a detailed map in your request of data for the proposed site. Due to a current backlog of enquiries we would strongly recommend that the applicant requests the data **as soon as possible**. Enquiries can take up to 10 weeks at the current time.
- The proposed development also should consider a range of flood resistance and resilience measures. Due to the nature of flooding at this site it would be expected that a flood evacuation plan is in place prior to occupancy; details of this should be outlined in the revised FRA.

Guidance on how to prepare a flood risk assessment can be found at <https://www.gov.uk/guidance/flood-risk-assessment-for-planning-applications>.

If this cannot be achieved, we are likely to maintain our objection. Please re-consult us on any revised FRA submitted and we will respond within 21 days of receiving it.

Advice to Local Planning Authority/Applicant

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.

- Adequacy of rescue or evacuation arrangements
- Details and adequacy of an emergency plan
- Provision of and adequacy of a temporary refuge
- Details and adequacy of flood proofing and other building level resistance and resilience measures
- Details and calculations relating to the structural stability of buildings during a flood
- Whether insurance can be gained or not
- Provision of an adequate means of surface water disposal such that flood risk on and off-site isn't increased

Flood Resistance and Resilience

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. In the meantime, 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. The following documents may also be useful:

- *Department for Communities and Local Government: Improving the flood performance of new buildings:* <https://www.gov.uk/government/publications/flood-resilient-construction-of-new-buildings>

Signing Up for Flood Warnings

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>.

Advice to Local Planning Authority

If you are minded to approve the application contrary to our objection, we would be grateful if you could re-notify us to explain why material considerations outweigh our objection, and to give us the opportunity to make further representations. Should our objection detailed above be removed, it is likely we will recommend planning conditions to be included on any subsequent approval.

In accordance with the Planning Practice Guidance (Ref. ID: 20150415), please notify us by email within 2 weeks of a decision being made or application withdrawn. Please provide us with a URL of the decision notice, or an electronic copy of the decision notice or outcome.

Exception Test

In accordance with the National Planning Policy Framework, the proposed development fails to meet the requirements of the exception test. Our comment on the proposal is that it fails to demonstrate the development is safe for its lifetime and won't increase flood risk elsewhere. The local planning authority must decide whether or not the proposal provides wider sustainability benefits to the community that outweigh flood risk.

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 e-mail: planningSSD@environment-agency.gov.uk