

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

Our ref: HA/2022/124361/01-L01
Your ref: APP/22/00606
Date: 17 August 2022

Dear Sir/Madam

**GARDEN WALL EXTENSION UPON RETAINING SEA WALL, EXISTING
BRICKWORK TO EXISTING EXTERNAL STORE AND DETACHED STUDIO RE-
PAINTED TO MATCH EXISTING 23 TOWER STREET, EMSWORTH, PO10 7BH**

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

The application site lies within Flood Zone 3 and Flood Zone 2, which is land defined by the planning practice guidance as having a high probability of flooding. We have produced a series of standard comments for local planning authorities and planning applicants to refer to on 'lower risk' development proposals. These comments replace direct case-by-case consultation with us. This proposal falls within this category.

These standard comments are known as Flood Risk Standing Advice (FRSA). They can be viewed at <https://www.gov.uk/guidance/flood-risk-assessment-for-planning-applications#when-to-follow-standing-advice>

The FRA needs to 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.

For this site, the FRA needs to adequately assess the flood risks posed by the development. In particular, the FRA needs to:

- provide flood levels for a 1 in 200 year return period plus climate change tidal flood event for the lifetime of the development
- take the impacts of climate change into account
 - An assessment of the impact of climate change using appropriate climate change allowances for a 1 in 200 year return period plus climate change

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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- event for the lifetime of the development compared to current levels and site topographic levels
 - Flood risk mitigation measures to address flood risk for the lifetime of the development need to be included in the design to ensure it is resilient to the flood levels for a 1 in 200 year return period plus climate change event
- consider the impact on the structural integrity of the existing sea wall
- consider how a range of flooding events (including extreme events) will affect people and property
- 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 a 1 in 200 year return period plus climate change event

Advice to Applicant

Planning permission does not remove the requirement for an Environmental Permit. The Environmental Permitting (England and Wales) Regulations 2016 require a permit 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 culvert (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 03702 422 549. **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.**

The proposed works are located within 16 metres of a sea defence designated by the Environment Agency. Under the terms of the Environmental Permitting (England and Wales) Regulations 2016, the proposed works will require the prior written permission of the Environment Agency in the form of a Flood Risk Activity Permit (FRAP).

As part of the FRAP application, the applicant should submit a Flood Risk Assessment which addresses the points highlighted above and seen below.

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.

- Provide flood levels in metres Above Ordnance Datum for a 1 in 200 year return period plus climate change tidal flood event for the lifetime of the proposed development compared to current 1 in 200 year return period levels
- Assess the impact of climate change using appropriate climate change allowances for a 1 in 200 year return period plus climate change event for the lifetime of the development compared to current levels and site topographic levels

- Provide detailed levels (ground & overtopping level) of the existing sea wall compared to levels of the proposed sea wall
- Provide engineering drawings of the new sea wall demonstrating its resilience to the flood levels for a 1 in 200 year return period plus climate change event including freeboard
- Provide an engineer's assessment on the impact on the existing sea wall which is classified as a sea defence (Asset ID: 458638, 3rd Party Maintained)
- Request "Product 4" flood data (including Climate Change) from the Environment Agency. 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.
- Assess how a range of flooding events (including extreme events) will affect people and property
- Assess how people and property would be kept safe if the new sea wall was to breach or be overtopped
- Sign up to Environment Agency Flood Warning service
- Develop a Flood Warning Evacuation Plan

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

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