

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

Our ref: HA/2021/123672/01-L01
Your ref: APP/21/00931
Date: 11 November 2021

Dear Sir/Madam

OUTLINE APPLICATION FOR DEMOLITION OF THE EXISTING BUILDINGS AND DEVELOPMENT OF THE SITE TO PROVIDE 31 HOMES WITH ASSOCIATED PARKING, ACCESS AND LANDSCAPING. DAIRY CREST DEPOT, DUNSBURY WAY, HAVANT

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(s)

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:

- 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 the extreme event
- take the impacts of climate change into account

- 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.
- Provide Flood risk mitigation measures to address flood risk for the lifetime of the development. This must be included in the FRA to ensure the development is resilient to the flood levels for a 1 in 100 year return period plus climate change event for the lifetime of the development. Consequently the development proposed needs to show:
 - o Raised finished floor levels
 - o Show resistance and resilience measures
 - o Show 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 most up to date flood levels can be obtained by requesting a free 'Product 4' from the Environment Agency's enquiries team on SSDEnquiries@environment-agency.gov.uk. Please provide a detailed map in your request of data for the proposed site.

Detailed information of the 1 in 100 year return period fluvial flood levels plus climate change allowances (found at '[Flood risk assessments: climate change allowances](#)') compared with the sites ground levels should be calculated and provided in the FRA. An appropriate freeboard should then be applied to the finished floor levels (FFL's) to keep the occupants safe for the lifetime of the development, usually a minimum of 300mm. Under the NPPF vulnerability classification guidelines this development proposal falls under the 'More Vulnerable' classification as it is residential with bedrooms on the ground floor.

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 LPA

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

Advice to Applicant

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.

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 02030 257250

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