Our ref:	HA/2021/123260/02-L01
Your ref:	APP/21/00320
Date:	29 June 2021

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

Dear Sir/Madam

FRA SUBMITTED - CONVERSION OF MOTORHOME GARAGE INTO A 2 BEDROOM DETACHED BUNGALOW, DRIVE TURNED INTO A SHARED DRIVE FOR THE EXISTING HOUSE AND THE NEW BUNGALOW AND CONSTRUCTION OF A GARAGE BLOCK OF 2, 1 FOR EACH HOUSE 69 SANDY POINT ROAD, HAYLING ISLAND, PO11 9RR

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 (FLOOD_RISK_ASSESSMENT-1493782) 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 adequately assess the flood risks posed for the lifetime of the development. The FRA will need to comply with the requirements for site-specific flood risk assessments that adequately assesses the flood risks posed for the lifetime of the development.
In particular, the FRA fails to:

- provide details of finished floor levels (FFL's) compared to 1 in 200 year return period plus climate change tidal flood levels for the lifetime of the development
- 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

- 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
- 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

Overcoming our objection
To overcome our objection, the applicant should submit a flood risk assessment (FRA) which addresses the points above and demonstrates that the development is not at risk of tidal flooding for the lifetime of the development.
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. Requests are usually dealt with within 20 working days.

Detailed information of the 1 in 200 year return period tidal flood levels plus climate change allowances compared with the sites ground levels should be provided. 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. 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.
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.
A checklist on what should be included in a flood risk assessment can also be found on the gov.uk website here – https://www.gov.uk/guidance/flood-risk-and-coastal-change#Site-Specific-Flood-Risk-Assessment-checklist-section.

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 our Local Planning Authority to determine what information is available.

We ask to be re-consulted with the results of an FRA. We will provide you with bespoke comments within 21 days of receiving formal re-consultation. Our objection will be

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maintained until an adequate FRA has been submitted.

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.

- Details and adequacy of flood proofing and other building level resistance an resilience measures
- Details and calculations relating to the structural stability of buildings during a flood
- Details and adequacy of an emergency plan including rescue or evacuation arrangements
- Provision of and adequacy of a temporary refuge
- Whether insurance can or cannot be gained

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

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