

From: Maskell, Jon [<mailto:jon.maskell@environment-agency.gov.uk>]

Sent: 23 March 2016 16:03

To: David Eaves

Subject: RE: Planning Consultation APP/16/00098 151-153 Southwood Road Hayling Island

Hello David,

Apologies for missing your call.

I have checked our system and unfortunately I cannot find any records of being consulted on this application at the site. Therefore, I am sorry however, I very much doubt I will be in a position to give you a full formal response to this application. I know we were having troubles accessing the Havant Borough Council website when it moved to iDocs so that may be the reason as to why we haven't seen it. With this in mind I have outlined some general advice regarding flood risk for you to consider when making your decision.

In terms of the site in question, it is located within Flood Zone 2, defined as having a medium risk of flooding. Therefore the Sequential Test would need to be passed to the satisfaction of the Local Planning Authority (LPA) in line with the National Planning Policy Framework. This means that before proceeding to a determination, Havant Borough Council must apply the Sequential Test; that is, it must consider whether the applicant has demonstrated and sufficiently justified that no alternative sites are available in a lower flood risk zone.

Our comments in relation to elements of the Exception Test below, do not negate the requirement to first undertake the Sequential Test. The NPPF Planning Practice Guidance makes it clear that flood resistance and resilience measures should not be used to justify development in inappropriate locations.

Should the Sequential Test be successfully passed, the applicant would then need to pass the Exception Test and show how the development will be made safe over the lifetime of the development – for residential this would be 100 years (or to 2115 design flood event levels). The design flood event for this area is 4.5mAOD, with an additional freeboard of 0.3mAOD for climate change allowance this would require any finished floor levels to be set no lower than 4.7m above Ordnance Datum (AOD). This should prevent tidal flooding of the internal accommodation during the design flood event. This is particularly important for the bungalow, which will not have a higher refuge available to which residents could retreat.

We would point out that safe access and egress both in the immediate vicinity of the property, and to the wider Eastoke peninsula, could be flooded to a depth considered unsafe for pedestrians for a period of time should a design flood event occur.

The applicant should also submit a flood warning and evacuation plan as part of the proposed mitigation. Such a plan for a development in this location should consider the anticipated speed of onset, depth and duration of flooding in determining the most appropriate strategy for enabling occupants to avoid flood hazards.

The Environment Agency does not normally comment on or approve the adequacy of flood emergency response procedures or accompanying development proposals, (including structural considerations where there is a reliance on refuge within buildings) 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.

The Planning Practice Guidance to the National Planning Policy Framework (Flood Risk and Coastal Change) states that those proposing developments should take advice from the emergency services when producing an evacuation plan for the development as part of the flood risk assessment.

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.

We would recommend that the following issues need to be considered by the LPA, in consultation with relevant experts, when coming to a decision on this application:

1. Whether or not the principle of relying on flood response planning (prior warning and evacuation or refuge) is acceptable given the potential flood risk (depths and hazard) outlined above, then;
2. Whether or not the proposed refuge will enable people to remain safe, taking into account
 - a. The resilience and recoverability of essential services during and after a flood
 - b. The ability of the buildings to remain structurally stable during a flood

I hope that this is of assistance.

Kind Regards
Jon

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Flood Risk Standing Advice was updated on 15 April 2015. For more information please follow the links below:

For developers: [FRSA developers page](#)

For councils: [FRSA council's page](#)