

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

Our ref: HA/2014/115831/01-L01
Your ref: APP/14/00529
Date: 15 July 2014

Dear Sir/Madam

**CHANGE OF USE TO ALLOW YEAR ROUND OCCUPANCY OF CARAVAN ON SITE
(REVISED APPLICATION).**

62 EASTOKE AVENUE, HAYLING ISLAND, HAMPSHIRE, PO11 9QP.

Thank you for consulting the Environment Agency on the above application, which was received on 26 June 2014.

Environment Agency Position

We **OBJECT** to this application because the proposed development falls into a flood risk vulnerability category that is inappropriate to the Flood Zone in which the application site is located. We recommend that the application should be refused planning permission on this basis.

Reasons:

Within Table 2: *Flood Risk Vulnerability Classification* (Planning Practice Guidance, Paragraph: 066 Reference ID: 7-066-20140306) it classifies development types according to their vulnerability to flood risk and gives guidance on which developments are appropriate in each Flood Zone. In this case the application site lies within tidal Flood Zone 3, defined by the Planning Practice Guidance as having a high probability of flooding.

The development type in the proposed application is classified as highly vulnerable in accordance with Table 2. Tables 1 and 3 of the Planning Practice Guidance make clear that this type of development is not compatible with this Flood Zone and should not therefore be permitted.

Overcoming our Objection

The National Planning Policy Framework (NPPF) clearly defines permanently occupied

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Romsey Depot Canal Walk, Romsey, Hampshire, SO51 8DU.
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www.gov.uk/environment-agency
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caravans, mobile and park homes as highly vulnerable development. This type of development is not appropriate for this area given its Flood Zone classification (tidal Flood Zone 3 - high probability).

The Environment Agency will resist any move to permanent occupancy of a caravan or mobile home at this site. The structures' instability places their occupants at special risk, they are likely to be occupied during periods when flood risk may be higher, and permanent occupancy can lead to a progression to permanent housing.

However, an extension of the occupancy period, providing it is less than 12 months and therefore classified as more vulnerable as opposed to highly vulnerable, might be possible subject to the Local Planning Authority's (LPA) interpretation of the risk outlined below.

The current 1 in 200 year tide level (Flood Zone 3 extent) is given as 3.4mAOD and this rises to 4.5mAOD by the year 2115, when the impacts of climate change and sea level rise are considered. Environment Agency data indicates that ground levels at the site are between 2.4 and 2.8mAOD.

Coastal defences are likely to defend the site against the current 1 in 200 year tide level (3.4mAOD), but future flooding of the site will become increasingly likely as sea levels are predicted to rise with climate change.

Advice to the Local Planning Authority / Applicant

We have previously advised the applicant with respect to the suitability of a shorter extension, such as a 48 week occupancy, which would classify the development as 'more vulnerable'. This would (in accordance with the NPPF) not change the vulnerability classification from the existing site, although it may increase the risks on site due to the units being occupied for longer periods of time. This will need to be considered by the LPA when making any decision.

Whilst the Flood Risk Assessment (FRA) provided is inadequate, when reviewed in conjunction with Environment Agency data, it is possible to determine the risk to the proposed development.

Information provided by the applicant suggests that finished floor levels on the site range between 2.9 and 3.3mAOD. The current 1 in 200 year tide level (Flood Zone 3 extent) is given as 3.4mAOD and this rises to 4.5mAOD by the year 2115, when the impacts of climate change and sea level rise are considered, demonstrating that the property is at risk of internal flooding in its lifetime. However, the site is located in an area benefitting from defences. These defences were designed to a 1 in 200 standard of protection in 2004 and so should protect the property from flooding. There is a residual risk of flooding should the defences breach or wave overtopping occur. The LPA will need to consider if this risk is acceptable.

We note that a personal flood plan has been submitted and that the applicant has signed up to the Environment Agency's flood warning service. The LPA will need to consider if this information and the mitigation measures it demonstrates are appropriate given the residual flood risk to the site. Please be aware that the Environment Agency does not normally comment on or approve the adequacy of flood emergency response and evacuation procedures accompanying development proposals, 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.

Within Paragraph 057 of the Planning Practice Guidance ('Making development safe from flood risk'), it places responsibilities on LPAs to consult their emergency planning staff with regard to specific emergency planning issues relating to new development. In all circumstances where warning and evacuation are significant measures in contributing to managing flood risk, we will expect LPAs to formally consider the emergency planning and rescue implications of new development in making their decisions.

If you have any queries regarding the information set out above, please contact me on the details below.

Yours faithfully

Miss Verity Giles
Planning Advisor, Environment Agency

Direct dial 01794834590

DiDirect e-mail PlanningSSD@environment-agency.gov.uk