

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

Our ref: HA/2013/114607/01-L01
Your ref: APP/13/00553
Date: 22 August 2013

Dear Sir/Madam

**CONSTRUCTION OF ONE PAIR OF 3 BED SEMI-DETACHED HOUSES AND 1NO. 2
BED BUNGALOW WITH ACCESS FROM SOUTHWOOD ROAD**

151-153 SOUTHWOOD ROAD, HAYLING ISLAND

Thank you for consulting the Environment Agency on the above application which was received on 12 August 2013.

Our response to this application on flood risk matters is on the understanding that the Local Planning Authority (LPA) is satisfied that the Sequential Test has been adequately demonstrated to the requirements of the National Planning Policy Framework (NPPF).

Before proceeding to a determination, the LPA must apply the Sequential Test; that is, it must consider whether the applicant has demonstrated that no alternative sites are available in a lower flood risk zone, in accordance with the NPPF.

Environment Agency Position

We can confirm that the Environment Agency has no objection in principle to the proposed development as submitted; however, we request that the following planning condition be attached to any planning permission granted in order to make the development acceptable.

Planning Condition:

The Environment Agency requests that the following condition be attached to any planning permission granted, and that details in relation to this condition (and on which the Environment Agency would wish to comment) be submitted to and approved by the LPA:

The development permitted by this planning permission shall be carried out in

Environment Agency
Romsey Depot Canal Walk, Romsey, Hampshire, SO51 8DU.
Customer services line: 03708 506 506
www.environment-agency.gov.uk
Cont/d..

accordance with the approved Flood Risk Assessment (FRA) (produced by Dan McGregor Associates and received by Havant Borough Council on 04 June 2013), and the following mitigation measures detailed within the FRA:

- 1. Finished floor levels are set no lower than 4.7m above Ordnance Datum (AOD) as per section 4.1 of the FRA.**

Reason: To ensure that the development remains safe over its lifetime.

Advice to the Local Planning Authority / Applicant

The proposed finished floor levels 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 however, 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 flood event occur.

The applicant proposes a flood warning and evacuation plan as part of the proposed mitigation. Some information has been provided within the FRA, but a full flood response plan has not been produced. 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 Technical Guide to the National Planning Policy Framework (NPPF), Paragraph 9, states that those proposing developments should take advice from the emergency services when producing an evacuation plan for the development as part of the FRA.

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:

- 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
- 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

For this development we note that whilst the principles of what should be in the flood warning and evacuation plan have been detailed within the FRA, the actual plan itself has not been provided. If the LPA are not happy with the flood warning and evacuation plan then planning permission should be refused.

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

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