

Appendix 4 – Correspondence

Land adjacent to 132 Havant Road, Hayling Island
Flood Risk Assessment

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

Our ref: HA/2012/112977/01-L01
Your ref: APP/12/00461
Date: 13 June 2012

Dear Sir/Madam

OUTLINE APPLICATION FOR CONSTRUCTION OF 4NO. DETACHED TWO STOREY HOUSES WITH ACCESS FROM HAVANT ROAD AND ALL OTHER MATTERS RESERVED.

LAND ADJACENT 132 HAVANT ROAD HAYLING ISLAND HAMPSHIRE PO11 0LJ

Thank you for consulting the Environment Agency on the above application which was received on 24 May 2012.

Environment Agency Position

The Environment Agency **OBJECTS** to this application as submitted, for the following reason(s):

The application has failed to meet the requirements of the second part of the flood risk Exception Test as set out in paragraph 102 of the National Planning Policy Framework (NPPF).

The Technical Guide to the NPPF requires the Exception Test to be applied in the circumstances shown in Tables 1 and 3. Paragraph 102 of the NPPF makes clear that both elements of the Exception Test must be passed for development to be permitted. Part 2 of the Exception Test requires the applicant to demonstrate in a site-specific flood risk assessment that the development will be safe, without increasing flood risk elsewhere, and, where possible will reduce flood risk overall.

The application site lies in within tidal Flood Zone 3a defined by the NPPF as having a high probability of flooding. Development classified as more vulnerable is only appropriate in these areas following application of the Sequential Test and where the Exception Test has been applied in full and has been passed. In this instance the submitted Flood Risk Assessment (FRA) fails to:

Environment Agency
Colvedene Court (Wessex Business Park) Wessex Way, Colden Common, Winchester, SO21 1WP.
Customer services line: 03708 506 506
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1. Demonstrate that the development is 'safe' because over its lifetime flooding to a depth of 2.4 metres could occur at the site. The Environment Agency does not consider that the submitted FRA demonstrates that a suitable level of safety can be provided for the occupants of the development.

Overcoming our Objection

To overcome our objection the applicant will need to demonstrate how the proposed development can remain safe from flooding over its full lifetime (100 years). The site could potentially be at risk of rapid inundation and so the provision of a safe refuge within the buildings should be clearly demonstrated, including how the proposed dwellings will remain structurally sound against the projected depths of flooding.

Taking into consideration the potential depths of flooding both internally within the dwelling and externally to the access routes, the requirement for a safe refuge is considered to be of paramount importance. Even if this refuge can be provided, we would only be prepared to remove our objection if the Local Planning Authority (LPA) consider that a reliance on an emergency response plan that requires prior evacuation or use of a refuge is appropriate as a means of keeping occupants safe in the absence of safe access and egress.

Advice to Local Planning Authority / Applicant

Our response to this application on flood risk matters is on the understanding that the LPA is satisfied that the Sequential Test has been adequately demonstrated to the requirements of the National Planning Policy Framework Paragraph 101 and Paragraph 3 of the Technical Guidance to the 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.

The proposed development is located within tidal Flood Zone 3 which is assessed as having a high probability of flooding. Applications for residential developments within this zone should be accompanied by evidence demonstrating that both the sequential and exception tests have been undertaken and passed.

The current 0.5% probability tide level (Flood Zone 3) is 3.3mAOD, rising to 4.4mAOD by the year 2115 when the effects of climate change and sea level rise are allowed for. In 2010 the Environment Agency commissioned Royal Haskoning to model the impacts of defences on flood risk on Hayling Island. The report produced demonstrated that the site in question would not be at risk from the current 1 in 200 tide level (3.3mAOD). However, for any events above a level of 3.5mAOD (approximately year 2048) the site is likely to flood. For an event of 4.5mAOD the flood risk to the site is assessed as posing a very high hazard.

The site specific FRA submitted with this application states that site and road access levels are set at about 2.0mAOD, with proposed finished floor levels being set at 2.1mAOD. The FRA further states that the site would remain accessible in a flood event (paragraph 11.5). It is accepted by the FRA that towards the end of the 100 year development lifetime flood depths could be in the order of 2.4m. Flood depths within the dwellings would be comparable. The Environment Agency/Defra R&D Technical Report FD2320, specifies that flood depths of this magnitude would present a danger for all,

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including the emergency services. Therefore, it is the view of the Environment Agency that safe access and egress under flood conditions would not be possible and we do not agree with the findings of the FRA in this respect.

The applicant has put forward a flood warning and evacuation plan and flood resilience measures as mitigation. However, given the magnitude of possible inundation (2.4m) within the buildings the Environment Agency does not consider that these measures adequately demonstrate that any occupants would remain safe if they were unable to evacuate in time. It is generally accepted that it is only possible to exclude water from the inside of a building when depths are less than 0.6metres. Water will therefore enter the dwellings to a significant depth. Further guidance on flood resilient/resistant building design can be found in the Communities and local Government publication 'Improving the flood performance of new buildings' which can be viewed at:

<http://www.communities.gov.uk/publications/planningandbuilding/improvingflood>

The Shoreline Management Plan (SMP) states that the seawall in the vicinity of the development site would be subject to breach during severe storm conditions. This would lead to rapid inundation of the site with little or no warning possible. Funding for improved defences is uncertain, and even if there were plans in place to deliver improved flood defences, there will always be a residual risk of flood defences failing, which would pose a significant risk to the proposed development. The presence of the Pound Croft main river along the northern boundary of the site is also highlighted. The Environment Agency has a record of this watercourse flooding in 2000. The FRA submitted in support of this application should identify the flood risks associated with this feature. The applicant is also advised that any works in, over, under or within 8 metres of a main river will require the permission of the Environment Agency and this will only be granted if the works do not pose a flood risk or restrict access for essential maintenance purposes. The Environment Agency has concerns relating to the proximity of the northern most building to the watercourse and consent may not be issued if it is considered that access is being restricted.

If the applicant can demonstrate that the buildings would have a place of safe refuge above the 2115, 1 in 1000 year tide level of 4.6mAOD the Environment Agency may consider removing its objection. The LPA would need to decide, in consultation with relevant specialists, whether the flood warning and evacuation plan, together with a place of safe refuge provides a sufficient level of safety for the development to be acceptable.

The Environment Agency does not consider that the application currently submitted complies with Policy CS15 (Flood and Coastal Erosion Risk) of the Havant Borough Core Strategy.

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

Yours faithfully

Miss Verity Giles
Planning Liaison Officer

Direct dial 01962 764860

Direct e-mail verity.giles@environment-agency.gov.uk

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MEMO



EASTERN
SOLENT | COASTAL
PARTNERSHIP

To: David Eaves, Havant Borough Council	From: James Addicott Coastal Project Engineer Tel: 02392 446223
Date: 7 June 2012	On behalf of Eastern Solent Coastal Partnership

LOCATION: 132 HAVANT ROAD, HAYLING ISLAND

PROPOSAL: Outline application for construction of 4No. detached two storey houses with access from Havant Road and all other matters reserved.

REF NO: APP/12/00461

Response

The Coastal Partnership team **OBJECT** to the proposal. We consider that this development is not sustainable in its location on grounds of a high risk of tidal flooding accounting for climate change.

In addition to the site being shown to be within the present day Environment Agency tidal flood zones, flood mapping from the [Strategic Flood Risk Assessment](#) for this area shows that the site is likely to be increasingly affected by rising sea levels in the future. These outlines account for the most up-to-date predicted rises in sea-level over the coming century due to climate change.

For your information the present day 0.5% probability (1 in 200 year) extreme tide level for Langstone Harbour is 3.3m AODN and the 0.5% probability (1 in 200 year) extreme tide level in the year 2115 is 4.4m AODN. According to ground levels provided in the flood risk assessment, this could result in present day flood depths of up to 1.3metres and future flood depths of up to 2.4metres in the year 2115.

The Coastal Partnership consider that the proposal does not therefore conform with the Havant Borough Core Strategy Policy CS15 Flood and Coastal Erosion Risk as:

1. The site is located in a high hazard flood risk area according to the [Strategic Flood Risk Assessment](#).
2. The site-specific flood risk assessment does not demonstrate that the development will be safe, including the access, without increasing flood risk elsewhere, and, where possible, will reduce flood risk overall. The warning and evacuation plan is not considered appropriate to offer a sufficient level of safety to the occupants of the properties.
3. Although the scheme incorporates flood protection, flood resilience and resistance measures they are considered to be inadequate with a potential predicted flood depth of 1.4metres onsite.

We also wish to point out that there is a watercourse that is classed as a 'main river' called Pound Croft running along the northern boundary of the site. There is a potential risk from flooding from this watercourse particularly with the coincidence of high tides and heavy rainfall due to tide-locking. This does not appear to have been identified in the building design statement.

Whilst paragraph 5.5 of the Flood Risk Assessment states that "The owner has no knowledge of any previous flooding on this site.", Havant Borough Council holds records that show parts of the site were flooded to a depth of 200mm on 8th November 2000 due to tide locking of the Pound Croft ditch system. This drainage channel was subsequently en-mained to become a main river specifically because of this event.

Advice

The applicant has submitted a flood risk assessment for the site, however we disagree with the conclusions that state that:

- the proposal accords with the aims and objectives of the NPPF and its associated technical guidance;
- this proposal will not put additional people or property at risk.

We have reviewed the flood risk assessment and wish to provide the following comments. We have ordered these as per the section references in the report:

Ref	Page/Para	Comment	Action
1	Section 2.4	Unclear wording where states EA level of 1.4m AODN.	Change to read 'potential depth of flooding onsite is predicted at 1.4m.
2	Section 3.3	Cites the wrong text from the North Solent Shoreline Management Plan . This is relevant to Farlington and Drayton and it should be noted that this area does not lie within Hayling Island.	Change text to reference relevant SMP policy for this area of Hayling Island. See policy unit 5aHI08.
3	Section 6.1	It should be noted that the site is not considered 'water-compatible'. This is a terminology used in the Technical Guidance to the NPPF to describe water-compatible land uses with including development that has to be in that location for water based uses – e.g. boatbuilding etc.	Remove 'water-compatible' reference.
4	Section 6.3	It should be noted that there are watercourses onsite that are designated as 'main rivers' and therefore considered significant surface watercourses which present a flood risk to the development. These run along the northern boundary of the site.	Add reference to main river watercourse on northern boundary of the site.
5	Section 6.4	Tidal flooding is considered the predominant flood risk on site along with tide-locked surface water flows.	Comment only – no action.
6	Section 7.2	As per comment on section 2.4: This should read 'potential depth of flooding onsite is predicted at 1.4m' rather than 'flooding level'.	Change to read 'potential depth of flooding onsite is predicted at 1.4m.
7	Section 9.3	We do not consider that moving from grazing to residential use constitutes a redevelopment of a site and should be considered a greenfield development.	Comment only – no action.
8	Section 9.7	It should be noted that PPS25 text no longer a consideration since the National Planning Policy Framework and its Technical Guidance was released in March 2012.	Change to reference text from NPPF and its Technical Guidance.
9	Section 11	It is considered that the site specific flood risk assessment proposes little in the way of flood resistance and resilience of the properties. A depth of flooding of approximately 1.4m surrounding the properties would mean ensuring flood resistance and resilience is extremely difficult	Comment only – no action.
10	Section 11.8	Amend second paragraph to number 11.9. The predicted 0.5% probability (1 in 200 year) extreme tide level for this area in the year 2115 is 4.4m AODN and not 3.4m AODN as stated.	Change to read The predicted 0.5% probability (1 in 200 year) extreme tide level for this area in the year 2115 is 4.4m AODN.

Ref	Page/Para	Comment	Action
11	Section 14.2	It should be noted that the Shoreline Management Plan policy of Hold the Line does not guarantee any public funds being available for this area to improve defences into the future	Comment only – no action.

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Appendix 5 – SFRA Maps

Land adjacent to 132 Havant Road, Hayling Island
Flood Risk Assessment

%Title%

Legend

 PUSH Sub-region Boundary

 Areas that benefit from flood defences

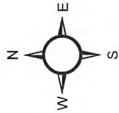
 Flood Storage Areas

Flood Zone 3

 Tidal Models

 Fluvial / Tidal Models

 Fluvial Models



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Legend

 PUSH Sub-region Boundary

 Areas that benefit from flood defences

 Flood Storage Areas

 Flood Zone 2

 Coastal Events

 Fluvial / Tidal Models

 Fluvial / Tidal Models and Coastal Events

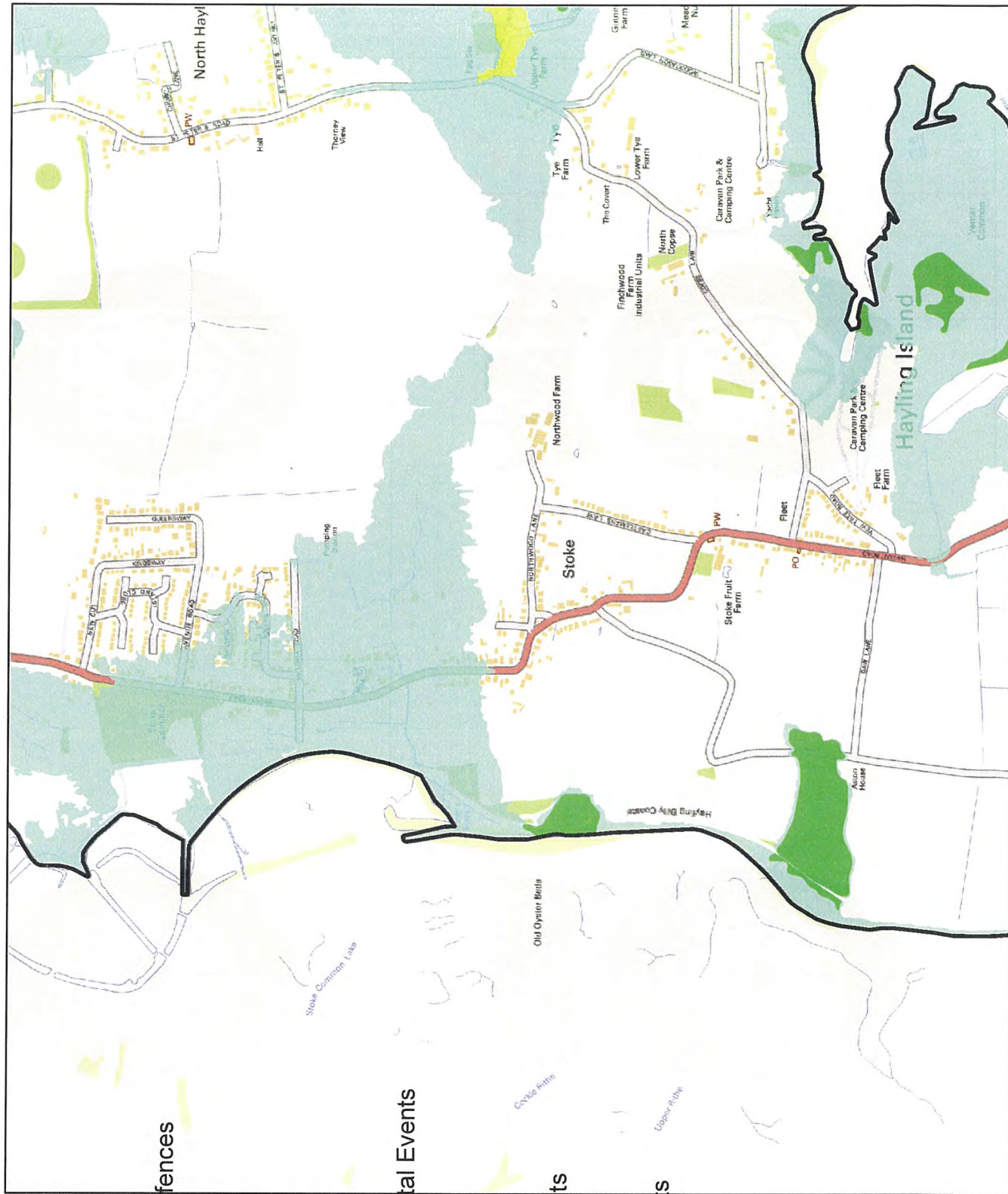
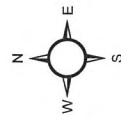
 Fluvial Events

 Fluvial Models

 Fluvial Models and Fluvial Events

 Tidal Models

 Tidal Models and Coastal Events



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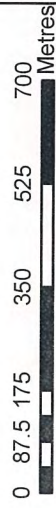
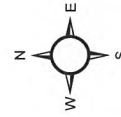
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 PUSH Sub-region Boundary

 Areas that benefit from flood defences

 Flood Storage Areas

 Historic Flood Map



Legend

Areas Susceptible to Surface Water Flooding - High

