

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

Our ref: HA/2019/121588/04-L01
Your ref: APP/19/00802
Date: 06 January 2020

Dear Sir/Madam

ERECTION OF MODULAR CLAD PORTABLE BUILDING FOR HEALTH AND WELLNESS ACTIVITIES

THE LANGSTONE HOTEL, NORTHNEY ROAD, HAYLING ISLAND, PO11 0NQ

Thank you for the consulting the Environment Agency on the above application.

We have reviewed the information as submitted and set out our position and comments below.

Environment Agency position

We are happy to **remove our outstanding objection** to the proposed planning application **subject to the inclusion of the following condition.**

Condition

The development shall be carried out in accordance with the submitted flood risk assessment (ref *Langstone Quays SPAShell Development Flood Risk Assessment [FRA]*) prepared by Alistair Johnson and dated 17th December 2019) and the following mitigation measures it details:

- Development will be built outside of current day Flood Zone 2 or Flood Zone 3.
- Finished floor levels will be set no lower than 800mm.
- As per the void management plan; the void under the structure will remain clear of any obstructions and this will be maintained at all times. A full maintenance and operations manual will be provided to the operator with the guidance on maintaining a clear void to be included.

These mitigation measures shall be fully implemented prior to occupation and subsequently in accordance with the scheme's timing/phasing arrangements. The measures detailed above shall be retained and maintained thereafter throughout the lifetime of the development.

Reason

- To reduce the risk of flooding to the proposed development and future occupants.

Advice to the Local Planning Authority

The flood risk associated with the proposed development is mostly mitigated through the relocation to Flood Zone 1 and out of the current day Flood Zones 2 and 3 as was the case in previous versions of this application. The applicant has requested climate change data for the site and whilst has not included these predicted levels in the FRA has set their FFLs to be approximately 800mm above ground level, this would leave them with some freeboard above the 1 in 200 year 2115 flood depths. Given that the site is commercial and classified as Less Vulnerable this is deemed an appropriate measure and the Environment Agency suggests the above conditions as a result. Likewise, the applicant suggests the use of a managed adaptive approach whereby the structure can be raised in future if needed, advice is given about this below.

The applicant has stated a designed lifetime of 20-30 years as a modular constructed building. With the FFLs proposed in the FRA and location of the development outside of the current day 2 and 3 Flood Zones this would see the development safe for its lifetime for the standard 60 years lifetime for commercial developments. It is the duty of the Local Planning Authority to accept or reject the applicants' stated lifetime of 20-30 years.

Evacuation Plan – Advice to the Local Planning Authority

We do not normally comment on or approve the adequacy of flood emergency response procedures accompanying development proposals, as we do not carry out these roles during a flood. It is up to the local planning authority (LPA) to determine whether the flood warning and evacuation plan or equivalent procedures are sufficient or not.

If the LPA is not satisfied, taking into account all relevant considerations, that a proposed development can be considered safe without the provision of safe access and exit, then planning permission should be refused.

Use of the managed adaptive approach – Advice to the Local Planning Authority

The development proposes flood risk mitigation measures that will be implemented in the future, taking a 'managed adaptive approach'. We encourage the local authority to consider the following issues when assessing the suitability of the applicant's approach:

- Can these mitigation measures be secured through the planning process? What do planners or developers need to do now in order to ensure these aspects?
- Is it reasonable to expect landowners to invest in these flood risk measures in the future to defend their property if provisions are not in place at the time of the development to fund these measures? If not, who will pay for these flood risk measures?
- Could any delay in implementing flood risk management measures lock-in irreversible impacts or limit flexibility to cope with future climate change? For example if climate change results in greater flooding than the capacity for flood defences to cope with, then the development could be exposed to an unmanageable risk.

Advice to Applicant – Signing up for flood warnings

The applicant/occupants should phone Floodline on 0345 988 1188 to register for a flood warning, or visit <https://www.gov.uk/sign-up-for-flood-warnings>. It's a free service that provides warnings of flooding from rivers, the sea and groundwater, direct by

telephone, email or text message. Anyone can sign up. Flood warnings can give people valuable time to prepare for flooding – time that allows them to move themselves, their families and precious items to safety. Flood warnings can also save lives and enable the emergency services to prepare and help communities.

For practical advice on preparing for a flood, visit <https://www.gov.uk/prepare-for-flooding>.

To get help during a flood, visit <https://www.gov.uk/help-during-flood>.

For advice on what to do after a flood, visit <https://www.gov.uk/after-flood>.

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

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