

External Alterations to the Flexible Use Industrial Building (permitted Under Application 22167/6) including Partial Reroofing, Recladding, Repainting, Changes to Fenestration. Removal of Existing Loading Bay Extension, Provision of New Loading Bay Doors, Erection of New Fence and Gates within Interior of Site, Rationalisation of Parking Layout & Replacement of Existing Open sided Entrance Canopy

At

36 New Lane, Havant,
Hampshire, PO9 2JL

Flood Risk Assessment



Figure 1 **Application Site - 36, New Lane, Havant – West Elevation**

Applicant:
Shed 5 Limited

1.0 Introduction

1.1 This Flood Risk Assessment is submitted with a planning application which seeks a grant of permission for *“External Alterations to the Flexible Use Industrial Building (permitted Under Application 22167/6) including Partial Reroofing, Recladding, Repainting, Changes to Fenestration. Removal of Existing Loading Bay Extension, Provision of New Loading Bay Doors, Erection of New Fence and Gates within Interior of Site, Rationalisation of Parking Layout & Replacement of Existing Open sided Entrance Canopy.”*

1.2 The proposed development would result in the continued use of the building as a flexible use industrial building with the majority of the proposed works relating to the recladding of the exterior of the structure. The only physical extension proposed to the building would be an open sided entrance canopy which would replace an existing canopy. The proposed development would not result in the creation of any additional internal floorspace.

1.3 The application site falls mainly within Flood Zone 1. It is only the western extremity of the site that is on the edge of the designated Flood Zone 3.



Figure 2 **Location of application Site & Surrounding Area**

2.0 Application Site Description

2.1 The application site comprises a large industrial unit located on the corner formed by the east side of New Lane and the southern side of Stanbridge Road in Havant. The building, which sits in a flat plot of approximately 1 hectare (2.44 acres), has a floor area of approximately 5800sq.m. set over both ground and mezzanine floors. The footprint of the building extends to the north and west from the sites south-east corner. The building is surrounded by an ‘L’ shaped, almost entirely hard surfaced, vehicle parking and manoeuvring area which itself is secured by a 2.2m high galvanised steel fence. The building which was constructed following the grant of planning permission in August 1986 (LPA Ref: 22167/6) as *“...a flexible use industrial unit with ancillary facilities...”* has been used over the years for a range of manufacturing and storage and distribution uses together with ancillary office accommodation.

2.2 The existing building has a footprint measuring a maximum width (north-south) of 56.0m

(excluding the loading bay which is 12m deep) and length (east to west) of 84.5m (excluding the open sided canopy). The building sits beneath an asymmetrical profiled steel roof with two planes which are separated by a flat roof 'channel' which runs west to east. Sited within the flat roof are a number of flat roofed storage containers. The roof has a maximum height of 10.3m to its northern ridge (the southern ridge being 8.2m high) and with the eaves being set at 8.0m and 6.0m above ground level respectively.

2.3 Projecting from the centre of the buildings west elevation is an open sided, gable roofed, entrance canopy, which has a maximum height of 9.8m, projecting from the face of the building by some 4.0m. An enclosed loading bay has been added to the north elevation of the building measuring a maximum 9.0m high, 12.0m deep and 7.0m wide. The majority of the buildings elevations are clad in a light grey coloured profiled steel sheeting, complemented by blue panelling, a decorative blue painted steel frame and blue aluminium framed windows.

2.4 The application site is set at the entrance to an industrial estate on Stanbridge Road. Immediately to the north of the application site, located on the opposite side of the road (i.e. 38 New Lane), are two terraces of 6 industrial units granted permission under APP/19/00660 in March 2020 for B1, B2 and B8 purposes. Immediately to the east of the application site is a former car park area of the current application site which was the subject of planning permission APP/16/00659 which granted consent for the construction of a warehouse with ground and first floor offices. This planning permission was issued on 23rd September 2016. Additional industrial and business premises are located to the north-east of the site on Downley Road. To the west of the application building, on the opposite side of New Lane are the nearest residential properties to the site. The east facing elevations of these dwellings are separated by a gap of some 68m from the nearest part of the application building.

2.5 The application site is located within the urban area of Havant within the well-established New Lane Industrial estate. The majority of the site is located within Flood Zone 1, however, the Environment Agencies Flood Mapping shows the sites western edge as possibly being within Flood Zones 2/3.

3.0 Proposed Development

3.1 The proposed development would result in the continued use of the building as a flexible use industrial building with the majority of the proposed works relating to the recladding of the exterior of the structure. The only physical extension proposed to the building would be an open sided entrance canopy which would replace an existing canopy. The proposed development would not result in the creation of any additional internal floorspace. The proposed works would result in the removal of the existing loading bay attached to the north elevation of the building as well as part of the existing mezzanine floor inside the building.

4.0 Planning Policy

Havant Borough Local Development Framework

4.1 The Havant Borough Core Strategy was formerly adopted on 1st March 2011. It is the principal document in the Council's Development Plan and sets out the spatial planning strategy for the area up to 2026. The relevant flood risk policies are as follows:

CS15 Flood and Coastal Erosion Risk

Development in areas at risk of flooding now and in the future as identified on the

latest Environment Agency flood risk maps and Strategic Flood Risk Assessment climate change maps will only be permitted where:

1. It meets the sequential and exception test (where required)..."

National Planning Policy Guidance

Relevant Parts of the National Planning Policy Framework, Revised December 2024

4.2 Guidance relating to flood risk relevant to this development is found at paragraphs 176 & 181 of the NPPF. Paragraph 176 states *"Applications for some minor development and changes of use⁶² should also not be subject to the sequential test, nor the exception test set out below, but should still meet the requirements for site-specific flood risk assessments set out in footnote 63..."* Footnote 62 states *"This includes householder development, small non-residential extensions (with a footprint of less than 250m²) and changes of use; except for changes of use to a caravan, camping or chalet site, or to a mobile home or park home site, where the sequential and exception tests should be applied as appropriate."*

4.3 The application site appears from the flood map data to fall mainly within Flood Zone 1. However, it is possible that the western edge of the site also falls within Flood Zones 2 and 3. As such a Flood Risk Assessment has been provided for the development. In such circumstances the application proposal falls into a category of development that is referred to in footnote 62 of the NPPF i.e. being a *"small non-residential extensions (with a footprint of less than 250m²) and changes of use"*. This being the case, and in accordance with paragraph 176 of National Planning Policy Framework, December 2024, it is not necessary for the applicant to undertake either a sequential or exception test.

4.4 Where it is necessary to undertake a Flood Risk Assessment guidance should be taken from paragraph 181 of the NPPF. This states:

"181. When determining any planning applications, local planning authorities should ensure that flood risk is not increased elsewhere. Where appropriate, applications should be supported by a site-specific flood-risk assessment⁶³. Development should only be allowed in areas at risk of flooding where, in the light of this assessment (and the sequential and exception tests, as applicable) it can be demonstrated that:

- a) within the site, the most vulnerable development is located in areas of lowest flood risk, unless there are overriding reasons to prefer a different location;*
- b) the development is appropriately flood resistant and resilient such that, in the event of a flood, it could be quickly brought back into use without significant refurbishment;*
- c) it incorporates sustainable drainage systems, unless there is clear evidence that this would be inappropriate;*
- d) any residual risk can be safely managed; and*
- e) safe access and escape routes are included where appropriate, as part of an agreed emergency plan."*

4.5 Footnote 63 of the NPPF states: *"A site-specific flood risk assessment should be provided for all development in Flood Zones 2 and 3. In Flood Zone 1, an assessment should accompany all proposals involving: sites of 1 hectare or more; land which has been identified by the Environment Agency as having critical drainage problems; land identified in a strategic flood risk assessment as being at increased flood risk in future; or land that may be subject to other sources of flooding, where its development would introduce a more vulnerable use."*

4.6 Figures 4 to 8 are images of the site downloaded from the Environment Agency's website. These show the application site in relation to:

- Flood Zones 1, 2 & 3 (Fig. 4);
- Flood Zones 1, 2 & 3 Taking into Account Climate Change 2070 – 2125 (Fig. 5);
- Flooding from Surface Water – 1 in 30 Annual Likelihood of Flooding (Fig. 6);
- Flooding from Surface Water – 1 in 100 Annual Likelihood of Flooding (Fig. 7) and;
- Flooding from Surface Water – 1 in 1000 Annual Likelihood of Flooding (Fig. 8).

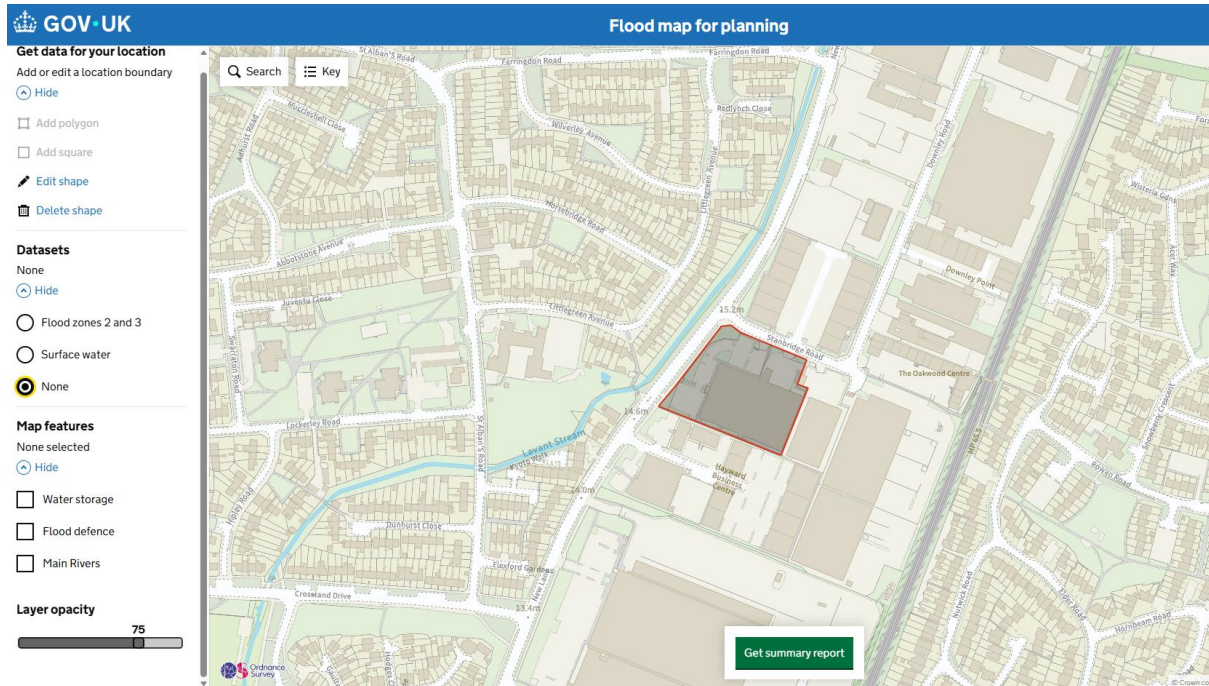


Figure 3 Application Site Location

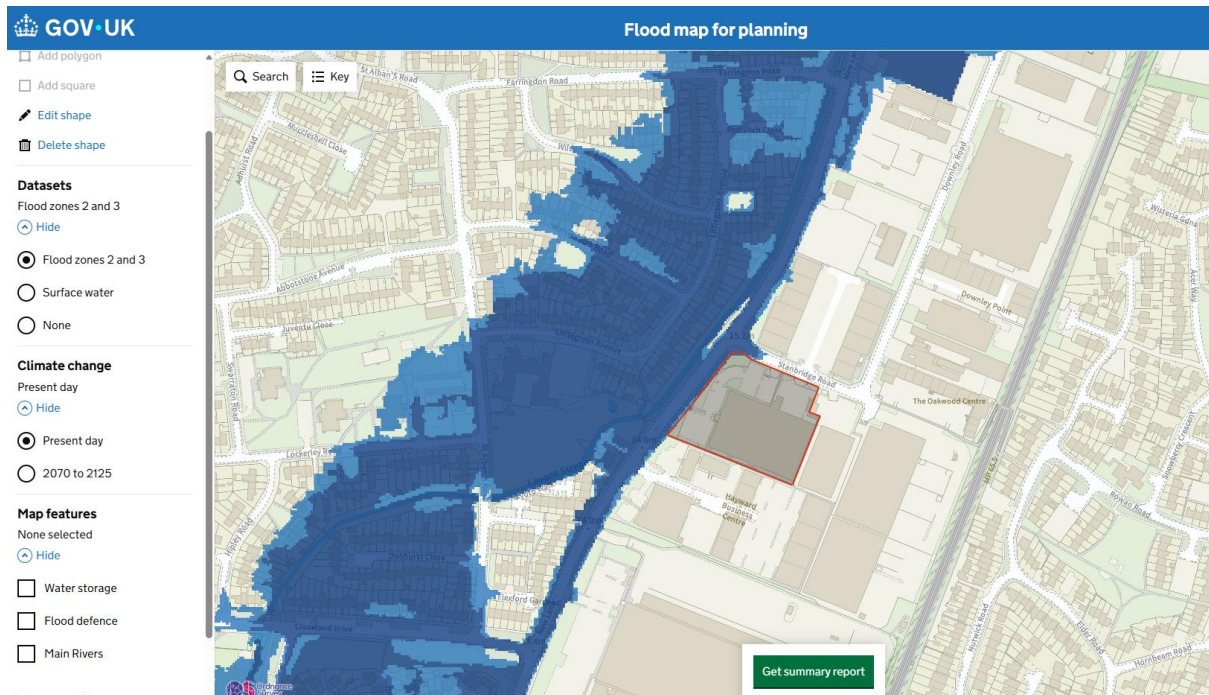


Figure 4 Application Site in Relation to Flood Zones 1, 2 & 3 Present Day

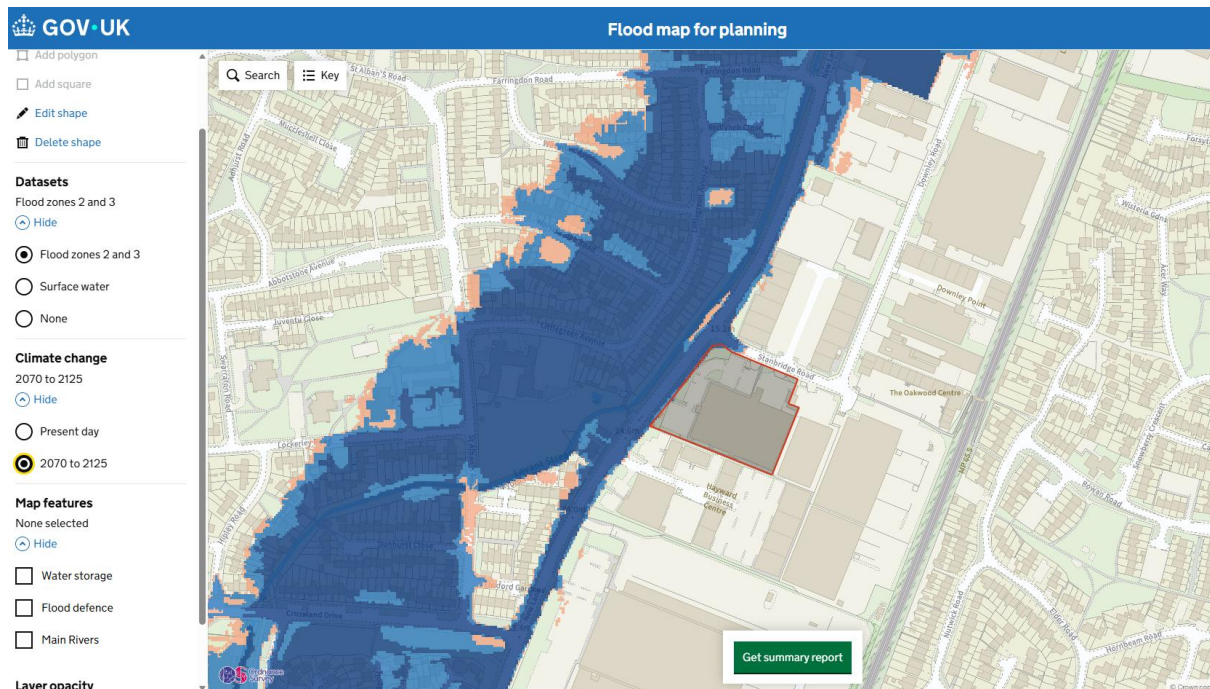


Figure 5 Flood Zones 1, 2 & 3 Taking into Account Climate Change 2070 – 2125

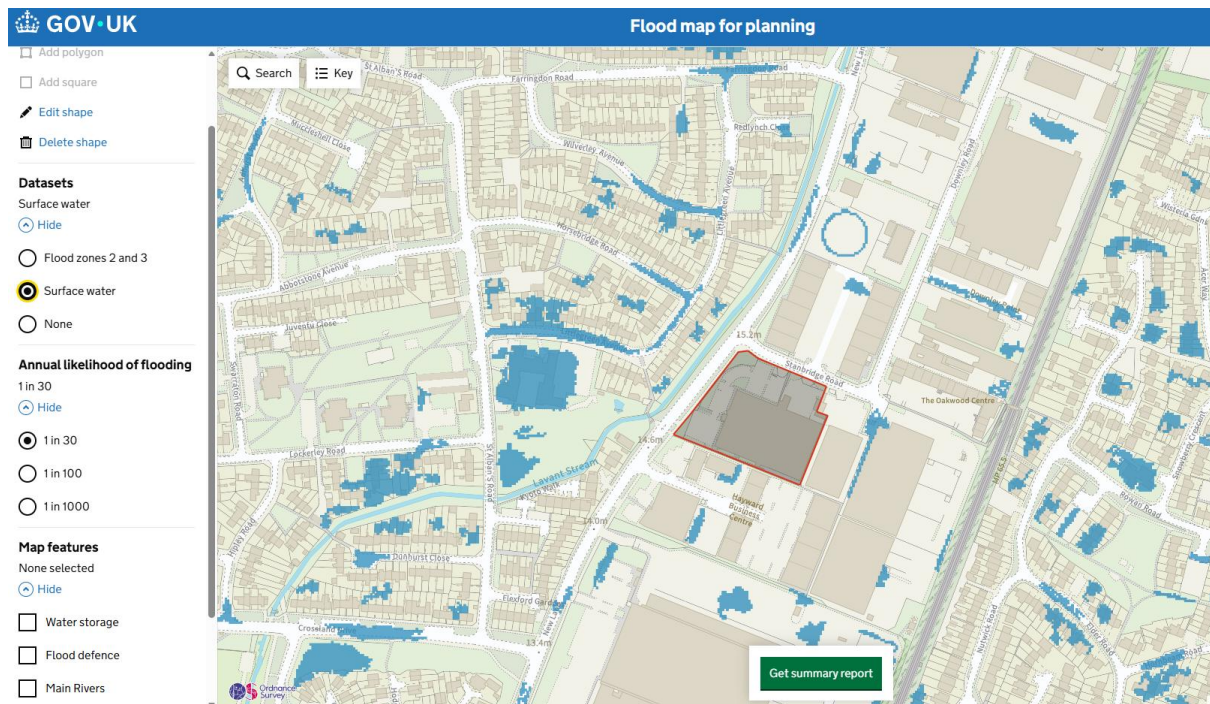


Figure 6 Flooding from Surface Water – 1 in 30 Annual Likelihood of Flooding

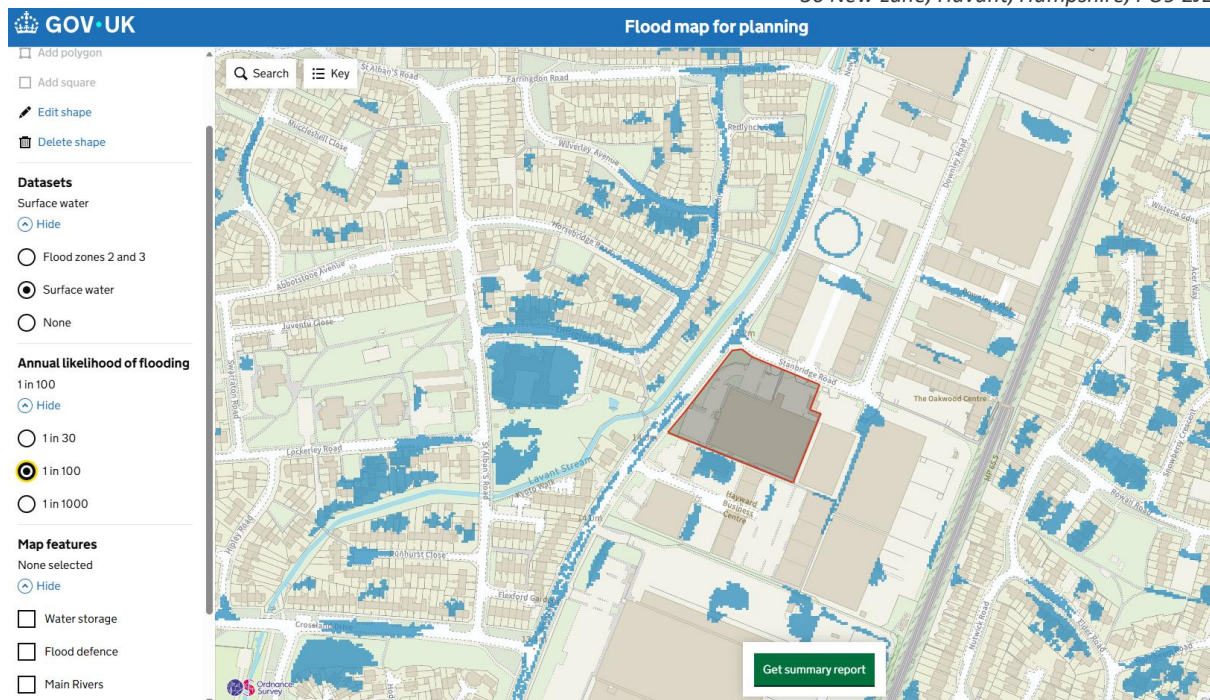


Figure 7 **Flooding from Surface Water – 1 in 100 Annual Likelihood of Flooding**

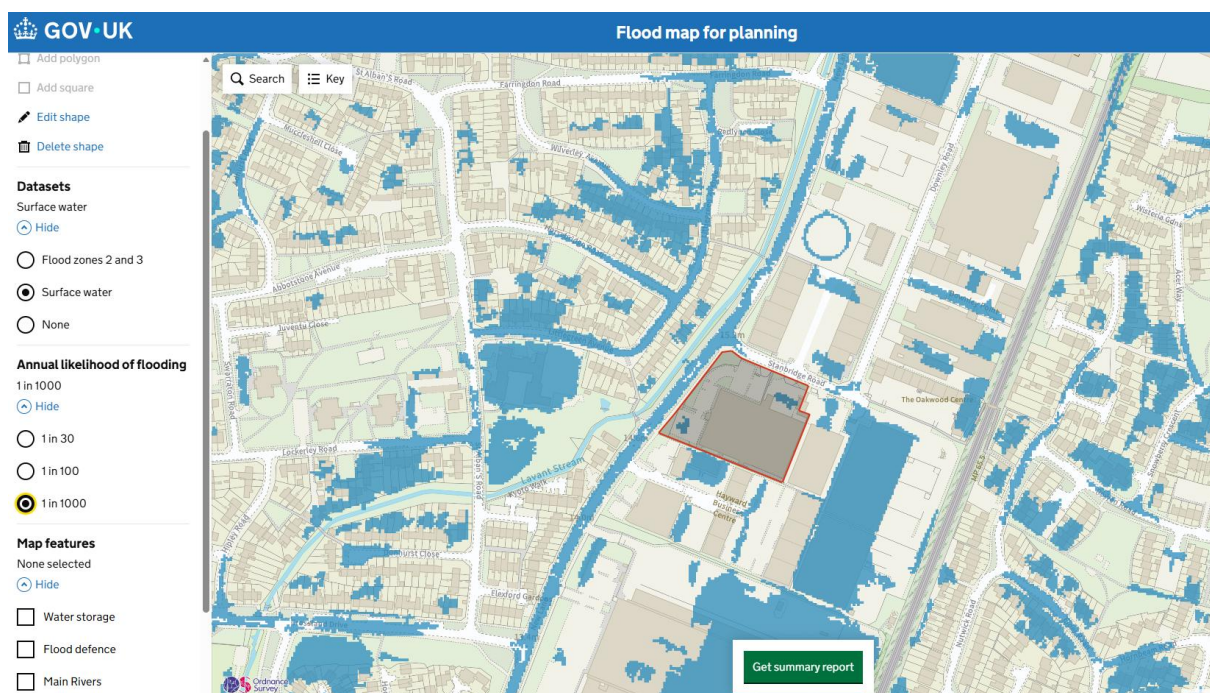


Figure 8 **Flooding from Surface Water – 1 in 1000 Annual Likelihood of Flooding**

5.0 Planning Considerations

5.1 Guidance relating to flood risk relevant to this development is found at paragraphs 176 & 181 of the National Planning Policy Framework, December 2024. These paragraphs are copied below together with our responses to each of the criteria a) to e) in green text below.

“181. When determining any planning applications, local planning authorities should ensure that flood risk is not increased elsewhere. Where appropriate, applications should be supported by a site-specific flood-risk assessment⁶³. Development should only be allowed in areas at risk of flooding where, in the light of this assessment (and the sequential and exception tests, as applicable) it can be demonstrated that:

- a) *within the site, the most vulnerable development is located in areas of lowest flood risk, unless there are overriding reasons to prefer a different location;*

The proposed development is for the continued use of the existing flexible use industrial building for industrial and business purposes. Although it is difficult to ascertain the extent of the exact boundary of Flood Zones 2 & 3 it appears that the existing building, in its entirety, is located within Flood Zone 1. The land immediately adjacent to the sites western boundary appears to be in FZ3. In the instance of a flood event occurring occupiers of the building would be able to access the higher ground to the east both within the application site and within Stanbridge Road. Given that the proposed development would not involve the provision of any new internal floorspace it is considered that it would be a minor non-residential development of less than 250sq.m. as defined by footnote 62 of NPPF paragraph 174. Given that the internal floorspace of the application premises does not fall within an area at risk of flooding either now or within the future it is considered that there are no overriding reasons why the proposed development should not be sited here, especially as it would not involve the extension of the existing building in a manner that would increase the gross internal area of the building.

- b) *the development is appropriately flood resistant and resilient such that, in the event of a flood, it could be quickly brought back into use without significant refurbishment;*

All internal works to be undertaken within the building would be carried out to comply with current Building Regulations and incorporate flood resilient design measures as recommended by “Improving the flood performance of new buildings - Flood resilient construction proposed development” by the Department of Communities & Local Government and the Environment Agency, 2007 (page 68). It is considered, therefore, that the proposed development would be flood resistant and resilient and could be quickly brought back into use in the instance of a flood event.

- c) *it incorporates sustainable drainage systems, unless there is clear evidence that this would be inappropriate;*

The proposed building and site is already served by adequate drainage systems. It is considered that the provision of additional drainage systems would be unnecessary.

- d) *any residual risk can be safely managed; and*

It is considered highly unlikely that the proposed development would cause any 'residual risk'.

- e) *safe access and escape routes are included where appropriate, as part of an agreed emergency plan."*

The application site comprises an existing flexible use industrial building. It appears that the building itself falls within Flood Zone 1, however, the land immediately adjacent the sites western boundary is within Flood Zones 2 & 3. In the instance of a flood event occurring occupiers would be able to access the higher ground immediately outside the building, particularly to the north and east on Stanbridge Road.

5.2 The proposed development would result in the continued use of the building as a flexible use industrial building with the majority of the proposed works relating to the recladding of the exterior of the structure. The only physical extension proposed to the building would be an open sided entrance canopy which would replace an existing canopy. The proposed development would not result in the creation of any additional internal floorspace. No part of the existing building falls within an area at risk of flooding either in the present day or in the future. As such, as is stated by paragraph 176 of the National Planning Policy Framework, 2024, the development should not be the subject of either a sequential or exception test. The proposed development, is, therefore, deemed to be acceptable.

6.0 Conclusions

6.1 As has been explained planning permission is sought for the for the "External Alterations to the Flexible Use Industrial Building (permitted Under Application 22167/6) including Partial Reroofing, Recladding, Repainting, Changes to Fenestration. Removal of Existing Loading Bay Extension, Provision of New Loading Bay Doors, Erection of New Fence and Gates within Interior of Site, Rationalisation of Parking Layout & Replacement of Existing Open sided Entrance Canopy."

6.2 Given that that the western boundary of the site possibly falls within an area designated as Flood Zone 2 & 3 it has been necessary to undertake a site-specific flood risk assessment. This has been undertaken in accordance with paragraphs 176 and 181 of the NPPF. Paragraph 176 of the NPPF advises that it is not necessary to undertake either a sequential or exception test due to the proposals not involving the provision of any non-residential floorspace.

6.3 It is considered that this assessment represents an appropriate analysis of the flood risk of the development and that, in the event of a flood, users of the development would be able to gain safe egress away from the building to higher ground either on land immediately surrounding the building or to the north and east of the site on Stanbridge Road. Internal works to the building would be carried out in accordance with Building Regulations to ensure any new services were installed in a flood resilient way. It is considered, therefore, that 'the land' could be brought back into use relatively quickly after the flood event, should one occur. Additionally, it is considered that the proposed development would not result in an increased flood risk to adjacent existing property.