creating a better place
for people and wildlife

Environment Agency

Havant Borough Council - Development Control

Reference: PA-0000861/01
Customer reference: APP/26/00083
31 March 2026

Proposed mezzanine floor area to support new office and storage accommodation with ground floor extensions to support storage and maintenance workshop areas with new external stairs and windows.

Tileasy House, Waterberry Drive, Waterlooville, PO7 7UW

Dear Planning Officer,

Thank you for contacting us.

This is our response to your consultation APP/26/00083.

Environment Agency position

In the absence of an adequate flood risk assessment (FRA) **we object** to this application and recommend that planning permission is refused.

Reason(s)

The submitted FRA does not comply with the requirements for site-specific flood risk assessments, as set out in paragraphs 20 to 21 of the Flood Risk and Coastal Change Planning Practice Guidance and its site-specific flood risk assessment checklist. The FRA does not therefore adequately assess whether the development will increase flood risk elsewhere. In particular, the FRA fails to:

- Consider the requirement for flood emergency planning including flood warning and evacuation of people for a range of flooding events up to and including the extreme event
- Consider how a range of flooding events (including extreme events) will affect people and property
- Consider how people will be kept safe from the identified flood hazards
- Take the impacts of climate change into account:
    - There is no assessment of the impact of climate change using appropriate climate change allowances (**East Hampshire Management**

Catchment) according to 'Flood risk assessments: climate change allowances'

- Flood risk mitigation measures to address flood risk for the lifetime of the development included in the design are inadequate because they will not make the development resilient to the flood levels. Consequently the development proposes inadequate:
  - Flood storage compensation
  - Resistance and resilience measures
  - Safe access and escape routes

Floodplain Storage Compensation

We require the applicant to complete a flood storage compensation assessment. This is necessary to prevent the development reducing flood plain storage and displacing flood waters, thereby increasing flood risk elsewhere.

Floodplain compensation should be provided on a 'level for level' basis, calculating the replacement of volumes lost from the floodplain through development, by reducing nearby ground levels. The compensatory volume must be at the same level, or provide a betterment, as the lost storage.

The FRA should be updated to detail how this can be provided. The FRA must demonstrate that level for level compensation has been considered, provide justification if this cannot be met and detail how any associated risks from other mitigation can be minimised.

Overcoming our objection

To overcome our objection, the applicant should submit a revised FRA which addresses the points highlighted above.

If this cannot be achieved, we are likely to maintain our objection.

Please re-consult us if a revised FRA is submitted and we will respond within 21 days of re-consultation.

Advice to the applicant and Local Planning Authority (LPA)

Product 4 and climate change allowances

The applicant has not identified the future design flood levels for a 1 in 200 year tidal flood event for the lifetime of the development.

We request that the applicant requests Product 4 data from the Environment Agency and include this in a revised version of the submitted FRA. They should use this information to assess the future flood levels from tidal sources impacting the site for the lifetime of the development.

Please contact SSDEnquiries@environment-agency.gov.uk (including a site map and grid reference) to obtain a Product 4 for your development. Please note, the future flood levels provided in the Product 4 were calculated before the latest climate change allowances were available. Please use the advice within 'Flood risk assessments: climate change allowances' to calculate the most up to date climate change levels.

Advice on flood risk issues that are not in our direct remit

The following issues are not within our direct remit or expertise but nevertheless are important considerations for managing flood risk for this development. Prior to deciding this application, we recommend that consideration is given to the issues below. Where necessary, the advice of relevant experts should be sought.

- Adequacy of rescue or evacuation arrangements
- Details and adequacy of an emergency plan
- Provision of and adequacy of a temporary refuge
- Details and adequacy of flood proofing and other building level resistance and resilience measures
- Details and calculations relating to the structural stability of buildings during a flood
- Whether insurance can be gained or not
- Provision of an adequate means of surface water disposal such that flood risk on and off-site isn't increased

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 do after a flood, visit https://www.gov.uk/after-flood.

Advice to LPA

We are aware that your LPA may currently be subject to the 'presumption in favour of sustainable development'. Given our outstanding objection on flood risk grounds we would like to highlight that in this case, as set out in NPPF footnote 7, the 'presumption in favour of sustainable development' should not apply as our objection provides a clear reason for refusal. If your LPA is not subject to the 'presumption in favour of sustainable development' you can disregard this paragraph. If our objection on flood risk is subsequently withdrawn, you can also disregard this paragraph

If you are minded to approve the application contrary to our objection, we would be grateful if you could re-notify us to explain why material considerations outweigh our objection, and to give us the opportunity to make further representations. Should our objection detailed above be removed, it is likely we will recommend planning conditions to be included on any subsequent approval.

In accordance with Paragraph 019 of the 'Determining a planning application' Guidance (Ref. ID: 21b-019-20190315), please notify us by email within 2 weeks of a decision being made or application withdrawn. Please provide us with a URL of the decision notice, or an electronic copy of the decision notice or outcome.

If you have any questions regarding our response, please contact Victoria.Hindmarsh@environment-agency.gov.uk.

Yours sincerely,

Victoria Hindmarsh,
+442080260503
Victoria.Hindmarsh@environment-agency.gov.uk